

J3.2. ORGANIZATION COMMENTS

This section provides the original copies of comments submitted by organizations during the Southwest Corridor Light Rail Project Draft EIS comment period, such as on letterhead or in the transcript of a public hearing testimony. Table J3.2-1 provides an index of these comments. For responses to these comments, see Appendix J2.2, Responses to Draft EIS Comments – Organization Comments.

Table J3.2-1. Index of Draft EIS Organization Comments (multipage table)

Comment ID	Organization Name	Commenter Name	Comment Type
O01	Ashcreek Neighborhood Association	Jerry Rundorff	Email with attachment
O02	Cascade Policy Institute	John Charles	Email with attachment
O03	Cascade Policy Institute	John Charles	Spoken testimony at public hearing (July 19, 2018)
O04	Coalition for SW MAX Railroad Options	Mark McGirr and Dick Clark	Hard-copy letter
O05	Crestwood Neighborhood Association	Tony Hansen	Email with attachment
O06	DoCoMoMo Oregon	Iain MacKenzie	Email with attachment
O07	Friends of Terwilliger	Anton Vetterlein	Online comment form text and attachment
O08	HAKI Community Organization & Community Alliance of Tenants	Saalim Saalim	Spoken testimony at public hearing (July 10, 2018)
O09	Hillsdale Business and Professional Association	Mike Roach	Email
O10	Hillsdale Neighborhood Association	Matt DeRosa	Online comment form text
O11	Homestead Neighborhood Association	Ed Fischer	Hard-copy letter
O12	Multnomah Neighborhood Association	Martie Sucec	Online comment form text and attachment, and email with attachment
O13	National University of Natural Medicine	David Schleich (email sent by Marilyn Considine)	Email with attachment
O14	National University of Natural Medicine	David Schleich	Spoken testimony at public hearing (July 19, 2018)
O15	OPAL Environmental Justice Oregon	Vivian Satterfield	Email with attachment
O16	Oregon and Southern Idaho District Council of Laborers	Chris Carpenter	Spoken testimony at public hearing (July 19, 2018)
O17	Oregon Health & Science University, Portland State University and Portland Community College	Connie Seeley, Dan Zalkow and Sylvia Kelley (email sent by Kathleen McMullen)	Email with attachment
O18	Oregon Walks	Roger Averbeck	Email with attachment
O19	Oregon Walks	Roger Averbeck	Spoken testimony at public hearing (July 19, 2018)
O20	Oregon Walks	Roger Averbeck	Spoken testimony at public hearing (July 26, 2018)
O21	Portland Bicycle Advisory Committee	Rithy Khut and Elliot Akwai-Scott (email sent by Elliot Akwai-Scott)	Email with attachment
O22	Portland Business Alliance	Dave Robertson (email sent by Nathaniel Brown)	Email with attachment
O23	Portland Freight Committee	Pia Welch and Raihana Ansary (email sent by Robert Hillier)	Email with attachment
O24	Portland Historic Landmarks Commission	Kristen Minor (email sent by Hillary Adam)	Email with attachment

Table J3.2-1. Index of Draft EIS Organization Comments (multipage table)

Comment ID	Organization Name	Commenter Name	Comment Type
O25	Portland Pedestrian Advisory Committee Members	Kenzie Woods, Tiel Jackson, Zoe Klingmann and Elaine O'Keefe (email sent by Kenzie Woods)	Email with attachment
O26	Portland Planning and Sustainability Commission	Katherine Shultz	Email with attachment
O27	Restore Oregon	Peggy Moretti	Email
O28	South Portland Neighborhood Association	G.L. Michon, Jr.	Email with attachment
O29	Southwest Neighborhoods, Inc.	Leslie Hammond (email sent by Sylvia Bogert)	Email with attachment
O30	SW Trails PDX	Doug Rogers	Email
O31	Tigard Chamber of Commerce	Debi Mollahan	Spoken testimony at public hearing (July 19, 2018)
O32	Tigard Town Center Advisory Commission	Kate Rogers	Email with attachment
O33	Tigard Town Center Advisory Commission	Carine Arendes	Online comment form with supplemental attachment
O34	Tigard Town Center Advisory Commission	Kate Rogers	Spoken testimony at public hearing (July 26, 2018)
O35	Tualatin Aging Task Force	Susan C. Noack	Hard-copy letter
O36	Tualatin Chamber of Commerce	Linda Moholt	Hard-copy letter
O37	Urban Design Panel	Brian Campbell	Email with attachment

001: Ashcreek Neighborhood Association

Email:

From: [REDACTED]
To: [swcorridor@eis](#)
Subject: Ashcreek neighborhood comments on SW Corridor
Date: Monday, July 30, 2018 1:45:50 PM
Attachments: [Ashcreek SW Corridor modification response.pdf](#)

Please see the attached PDF as it is Ashcreek Neighborhood Association's comments as a collective.

Jerry Rundorff
President, Ashcreek Neighborhood Association

[REDACTED]
[REDACTED]



Ashcreek Neighborhood Association

ANA Officers
 Jerry Rundorff, President (2019)
 Jack Klinker, Vice President (2019)
 Nancy Trullinger, Secretary (2019)
 Brian Hill, Treasurer (2019)
 Dean Smith, Corresponding Secretary (2019)

ANA Directors
 Taylor von Ahelfeld (2018)
 Dave Manville (2018)
 Hal Howard (2019)
 Phil Nielson (2019)
 Bruce Koester (2019)

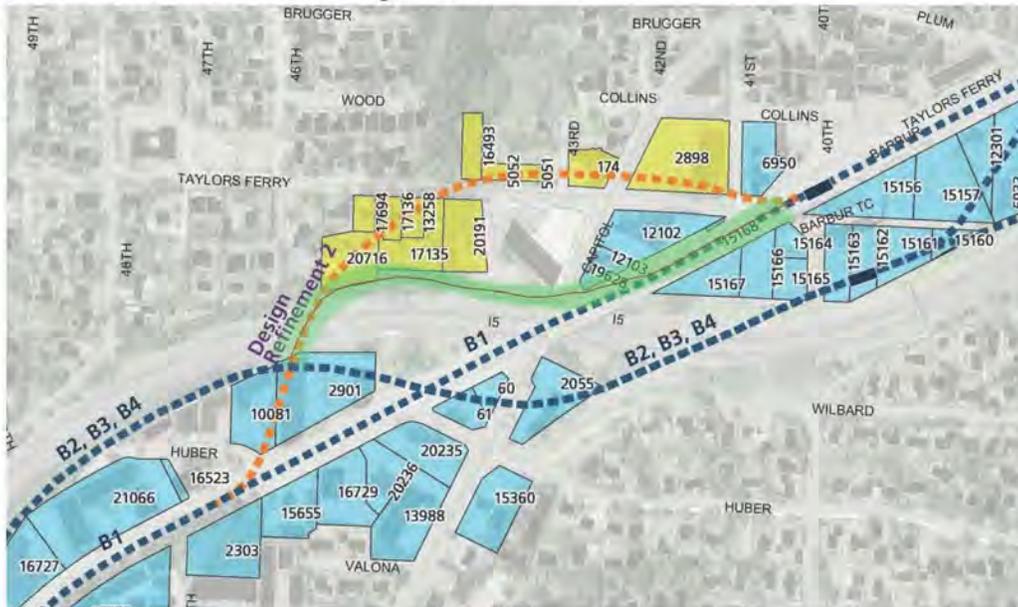
SW Corridor Steering Committee:

Our preferred route would be route B1, however we understand that option may not be financially viable, and could result in a no-build scenario. The Ashcreek Neighborhood Association can only support SW Corridor Light Rail alignments or refinements which improve pedestrian and bicycle mobility through and around the Capitol Highway crossroads area, while mitigating vehicle congestion. This area is currently a disaster for all modes of transportation, but is especially dangerous for bicyclists and pedestrians.

A center running light rail down Barbur Boulevard would have addressed these issues, but Refinement 2, the Taylors Ferry refinement, as currently proposed, lacks any kind of bicycle or pedestrian improvements in the area. That makes the refinement unacceptable to the Ashcreek Neighborhood Association. However, by adding a multi-modal path to the I-5 over-crossing, and adding at least a multi-modal path (or sidewalks and bicycle lanes) along Taylors Ferry from Capitol Highway to at least 48th Avenue, would allow us to support this refinement.

That said, our past president, Dean Smith, has suggested what we feel is a better route than Taylors Ferry. Namely, to take the light rail track down Barbur Boulevard until just before Capitol Highway, then veer off at, or just north of, the I-5 on-ramp (between I-5 and Walgreens). We believe that would result in fewer property acquisitions, would be less unsightly, would be less disruptive to traffic flow, all while achieving the overall objectives of Refinement 2. This may also decrease traffic congestion on Taylors Ferry and Capitol Hwy. This option would still require the aforementioned pedestrian and bicycle enhancements in order to receive the endorsement of the Ashcreek neighborhood association, however.

Please see "Dean Smith's refinement" image attached.



Thank you for your consideration,
 Jerry Rundorff
 President, Ashcreek Neighborhood Association

002: Cascade Policy Institute

Email:

From: [John Charles](#)
To: [swcorridorleis](#)
Subject: DEIS comments
Date: Monday, July 30, 2018 4:45:04 PM
Attachments: [SW Corridor Light Rail project EIS comments Revised.docx](#)

Dear Ms. Kehe,

Attached are comments on the SW Corridor DEIS.

Sincerely,

John A. Charles, Jr.
President & CEO
Cascade Policy Institute

[Redacted signature block]

Attachment:

July 30, 2018

Ms. Eryn Kehe
Metro
NE Grand Avenue
Portland, OR

Dear Ms. Kehe,

Cascade Policy Institute is a non-profit policy research organization based in Portland. We represent over 700 individuals, and many of them reside within the Portland metro region. We have reviewed relevant chapters of the Draft EIS for the SW Corridor Light Rail Project, and offer the following comments.

Route selection

We have no preference as to the various proposed routes. All of them suffer from the same fatal flaws, and none are likely to attract sufficient ridership to justify the enormous expense of construction.

Substantive flaws in the DEIS

According to the "Purpose and Need" statement, the purpose of the SW Corridor Project is to "directly connect Tualatin, downtown Tigard, southwest Portland, and the region's central city with light rail, high quality transit and appropriate community investments in a congested corridor to improve mobility and create the conditions that will allow communities in the corridor to achieve their land use vision."¹

Most of this sentence is meaningless, but there is one clause that is measurable: "improve mobility." In order to accomplish that goal, Metro and TriMet must be concerned with various components of a mobility analysis, including: traffic movement through congested intersections; effects of the project on I-5 ramps; levels of service and peak-hour frequency; cost of construction; estimated travel speed of light rail trains; and forecasted ridership.

We will focus our comments on those elements of the project,

Ridership projections are not plausible

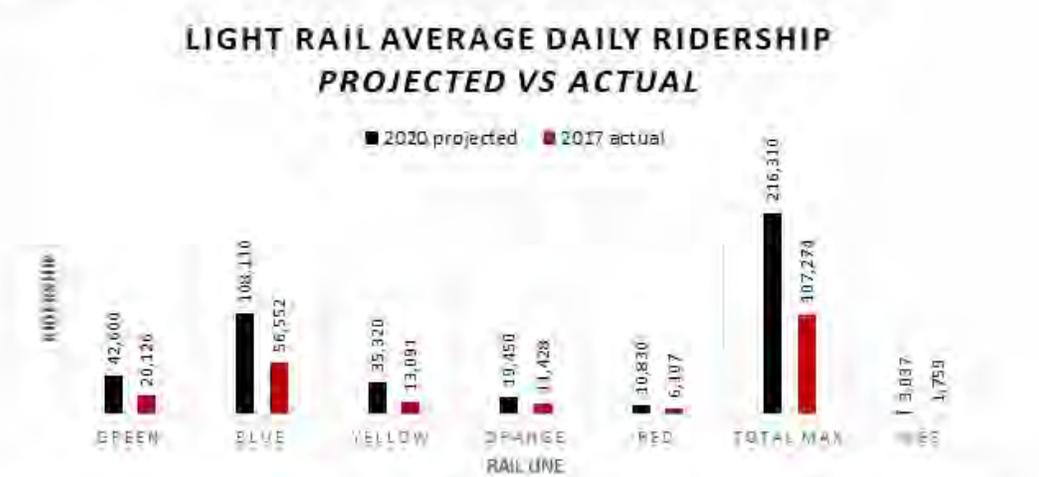
¹ Southwest Corridor Draft Environmental Impact Statement (DEIS) Summary, pages S-2, S-3.

The Draft EIS builds on more than 30 years of light rail construction and operation in this region, which provides a rich empirical record that can be used to help guide the decision about whether to expand the rail system in the SW Corridor.

In many previous projects, Metro/TriMet made MAX ridership projections for 2020. Since we are now mid-way through 2018, it's useful to re-examine those predictions and compare them with reality.

Figure 1 is a side-by-side of the 2020 average weekday daily ridership forecast for each previous rail line (including WES):

Figure 1



Sources: 2002 Green line Environmental Impact Statement, 2009 Orange line Environmental Impact Statement, TriMet 2017 monthly ridership reports. For 2020 Orange line forecast, the difference between the 2016 and 2030 forecasts were divided by 14, multiplied by 4, and then added to 2016 forecast. Additionally, due to 2003 expansion of the Red line, data was gathered from the original stops between Gateway and Portland International Airport.

As Figure 1 shows, previous EIS predictions have all been inflated. Actual ridership has never even reached 60% of projected ridership on a specific rail line; the Orange line is the closest at 59%. Total average weekday ridership is less than half the predicted ridership for MAX in 2020.

EIS ridership predictions for 2035: Given these consistent forecasting errors, the DEIS prediction that MAX average weekday ridership will total 317,200² in 2035 is not credible. Ridership would have to overcome decades of underperformance and triple between 2017 and 2035.

² DEIS, page 3-13.

With all lines combined, the through light rail alternative is predicted to have 337,900 average weekday boardings (**Figure 2**). This is an increase of 174.27% within 18 years from the 2017 fiscal year's average of 123,200. To put this in perspective, average weekday light rail ridership has increased by 85.85% between fiscal year 2000 and fiscal year 2018 up till the month of May— also a span of 18 years. Four rail lines were implemented between 2000 and 2018 while the Southwest Corridor DEIS bases its estimation on the implementation of only one light rail line between 2018 and 2035. Current light rail ridership has not been increasing over recent years. Instead, weekday boarding trends have either been decreasing or plateauing as seen in **Figure 3**. This undermines the plausibility of the estimated number of weekday boardings in 2035.

Figure 2

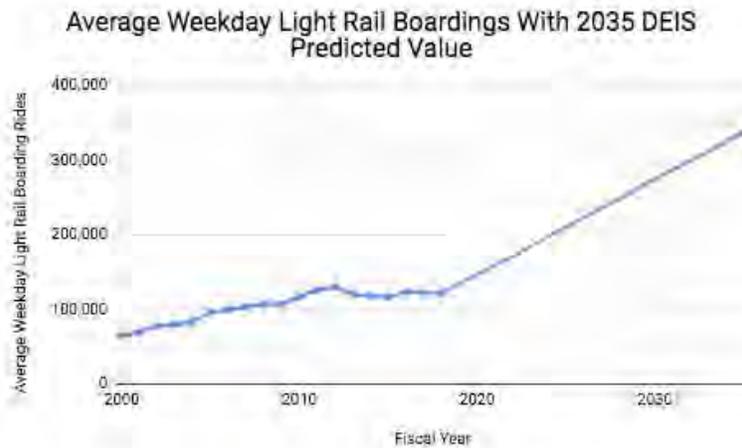
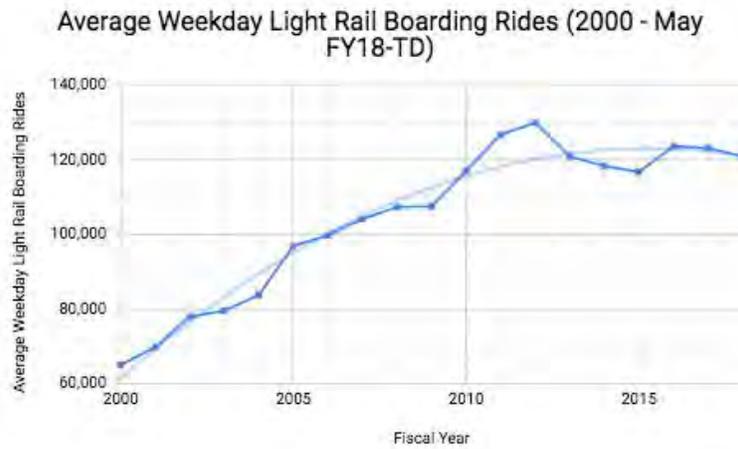
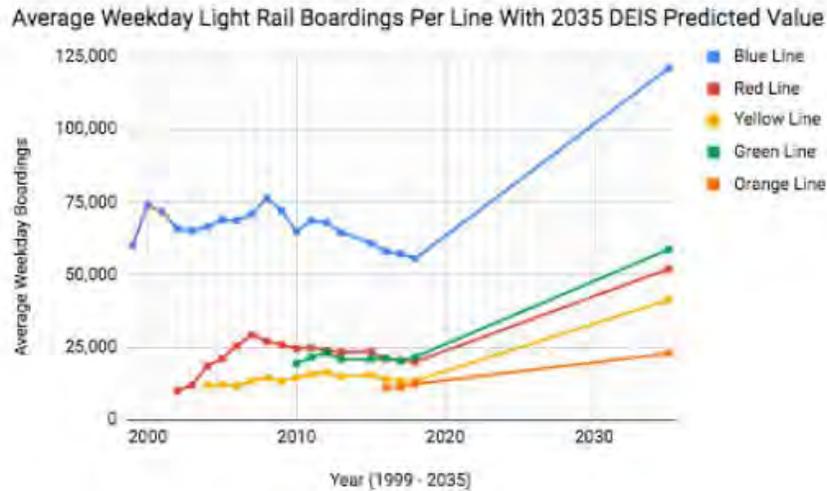


Figure 3



The DEIS predicts that weekday boardings across all lines will more than double, even though individual line trends are either decreasing or plateauing, demonstrated in **Figure 4**.

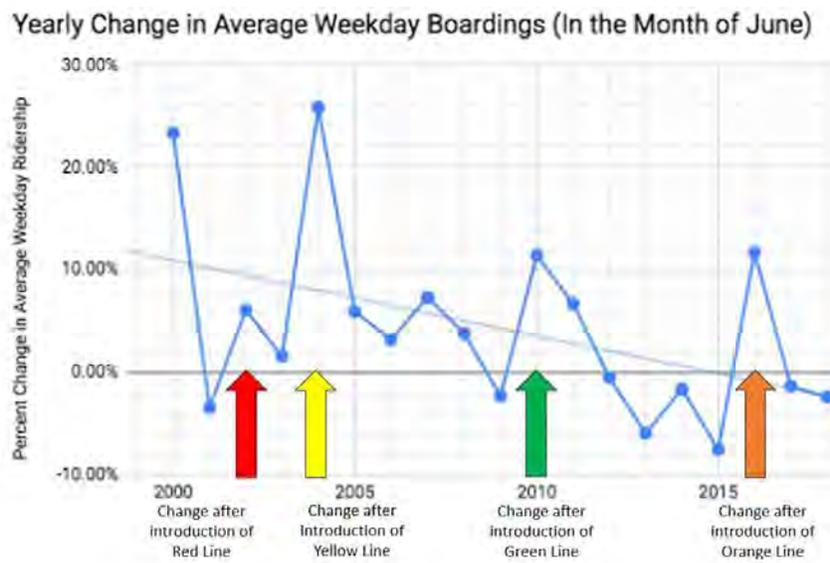
Figure 4



* Year 2003, 2005, 2015 use the month of July
 * Did not have access to data from 2014. Plotted null values.

The percent yearly change (Figure 5) in weekday ridership has been decreasing from year to year, and recently has been dipping into the negative percentage range, which demonstrates a decrease in boardings. A pattern has developed which shows percent change drastically increasing the year after a new line opened. After that initial first year the percent change tends to decrease up until the implementation of the next line. When a new light rail line is introduced, its percent increase in boardings is marginal - new light rail lines are adding fewer new riders.

Figure 5



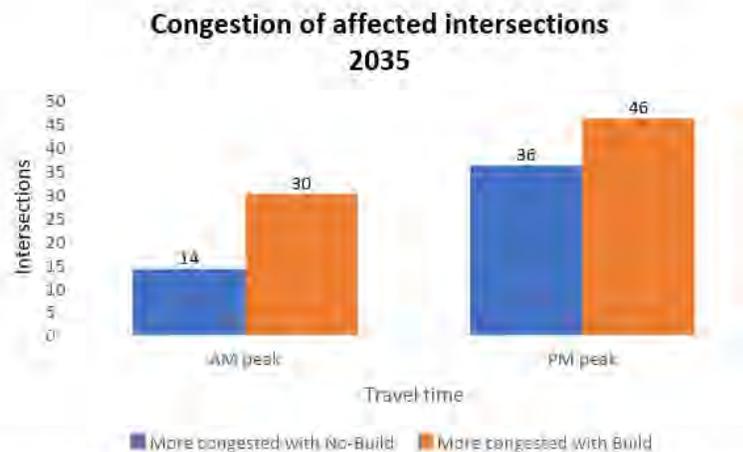
Light rail ridership is not increasing. It is steadily decreasing, and the number of new riders each new line attracts is shrinking. Based upon these patterns, the Southwest Corridor project will only temporarily increase ridership.

If this project is to move forward, the Final EIS must have a defensible ridership forecast that accounts for the consistent over-estimation of boardings on every single TriMet rail line to date.

Traffic Congestion

Reducing traffic congestion is one of the claimed benefits of this project, and the DEIS addresses likely congestion at relevant intersections and I-5 ramps.³ AM and PM peak periods were studied, with 44 affected intersections during the AM peak and 85 affected intersections during the PM peak being measured. V/c scores for each vehicle direction were given; by adding them together we can see the overall estimated congestion for each intersection under both the No-Build and Build alternatives. The results are in **Figure 6**:

Figure 6

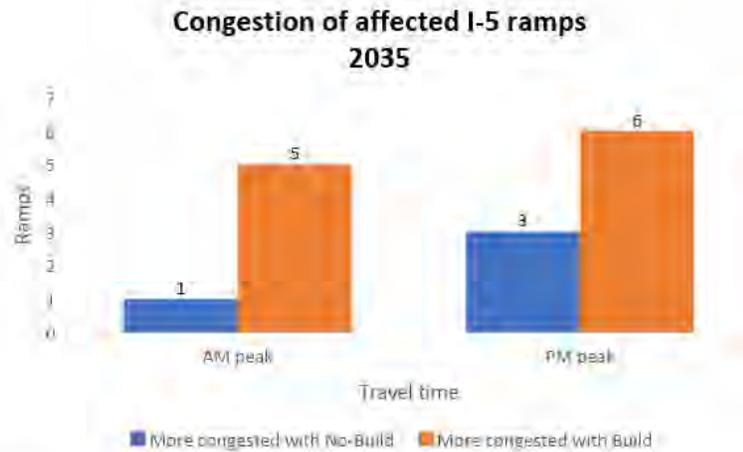


Sources are in footnote 3. Note: there were three ties present in PM peak intersections, which are excluded from the graph.

³ DEIS Attachment B – Transportation Impacts Results Report, Part 8 (Appendices L through Q); DEIS Attachment B – Transportation Impacts Results Report, Part 11 (Appendices S through CC).

Contrary to claims made by the project's proponents, the Southwest Corridor Light Rail Project is expected to **increase** overall traffic congestion for both AM and PM peak travel periods. In addition, the same pattern is exhibited in the expected the congestion of I-5 on/off ramps, shown in **Figure 7**:

Figure 7



Sources in footnote 3.

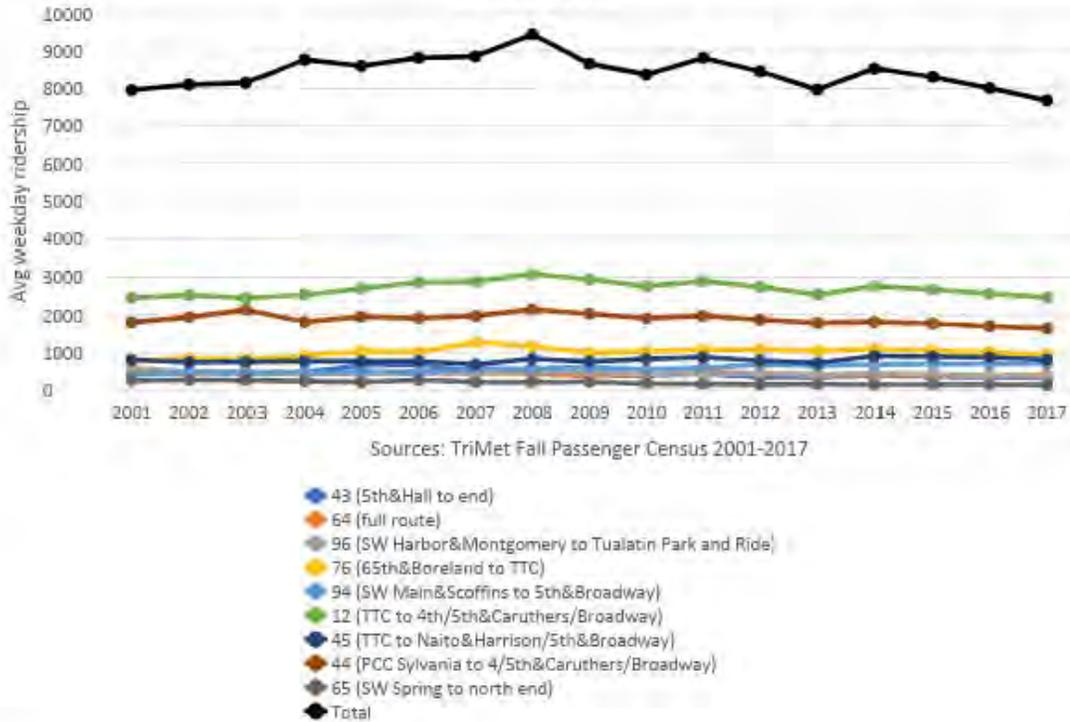
While the AM peak will be affected by a greater quantity of congested intersections under the Build alternative, both AM and PM peak times will be more congested than they would have been without the project.

SW Corridor transit ridership

Present transit ridership trends within the Southwest Corridor suggest that ridership on a new rail line will be low. Nine bus routes service the same route as the proposed light rail line; seven cover the entire route, while two cover fragments of it. As the predictions look 17 years into the future, it would be wise to look at trends 17 years into the past. Since 2001, bus ridership along these routes has decreased, as seen in **Figure 8**:

Figure 8

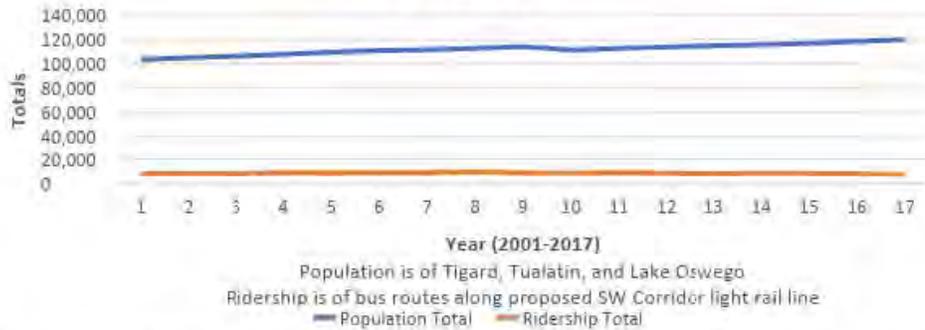
Average Weekday Bus Ridership on SW Corridor Bus Routes 2001-2017



While showing a downtrend in bus ridership, this graph does not account for population increases along the Southwest Corridor. The populations of Tualatin, Tigard, and Lake Oswego all increased by 16% from 2001-2017, shown in **Figure 9**:

Figure 9

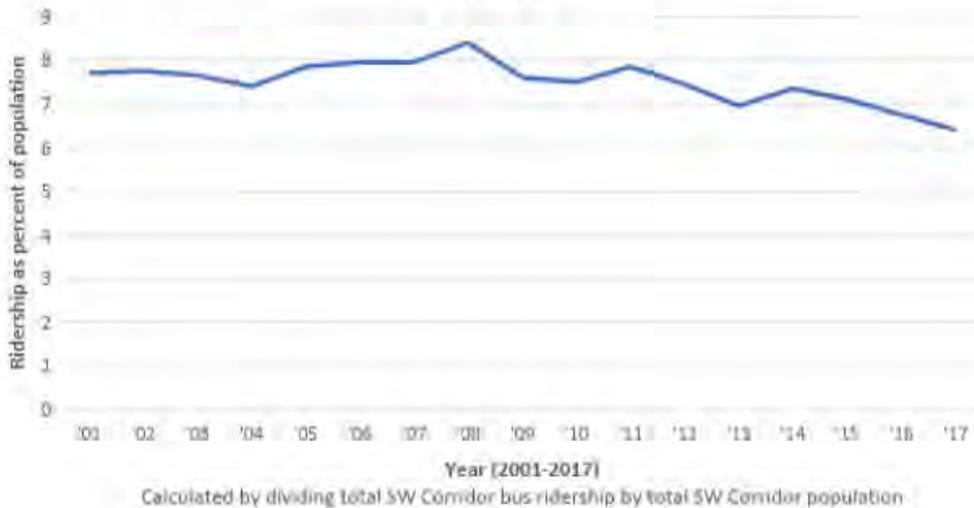
**SW Corridor Population vs Bus Transit Ridership
2001-2017**



Thus, bus transit ridership measured as a proportion of the relevant population was bleaker, seen in **Figure 10**:

Figure 10

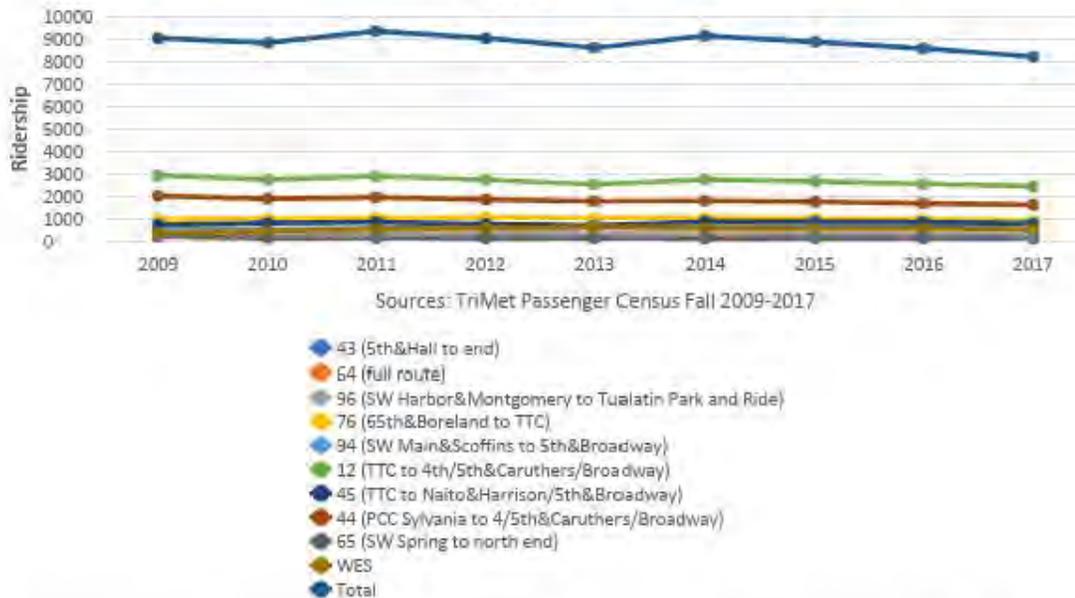
**Percent of residents who ride bus transit in SW Corridor
2001-2017**



It could be objected that bus transit is not the only type of available transit in the Southwest Corridor – part of the WES route runs between Tualatin and Tigard, and some of these riders could use the proposed light rail in the future. **Figure 11** illustrates combined ridership of both WES and bus routes in the Southwest Corridor, beginning with the WES opening in 2009.

Figure 11

Average weekday transit ridership on SW Corridor transit routes 2009-2017



Only three out of ten routes increased ridership during this period (bus routes 64, 45, WES). As shown, overall ridership decreased. Again, this does not account for the population increase in the attendant locations. Even including WES, total transit ridership as a proportion of population has decreased (Figure 12):

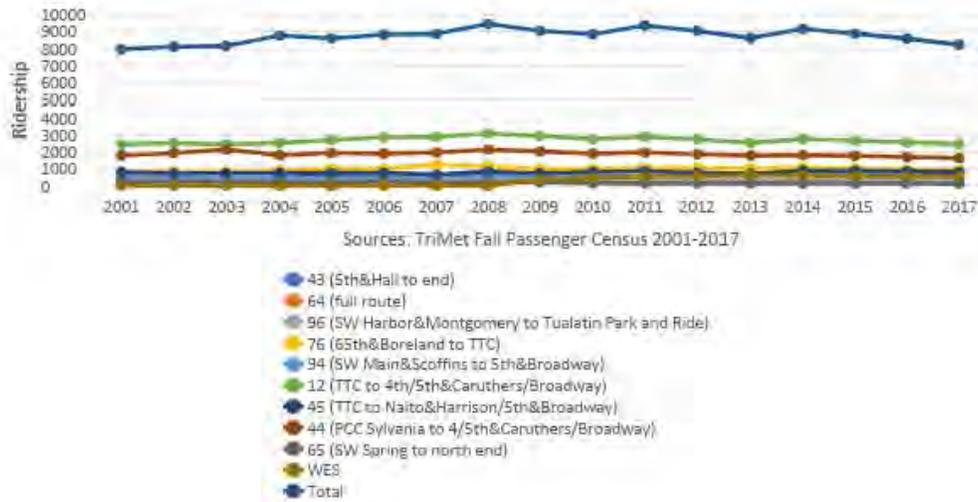
Figure 12



The only increase in any of these measurements is the 2001-2017 total transit ridership, as evidenced by **Figure 13**:

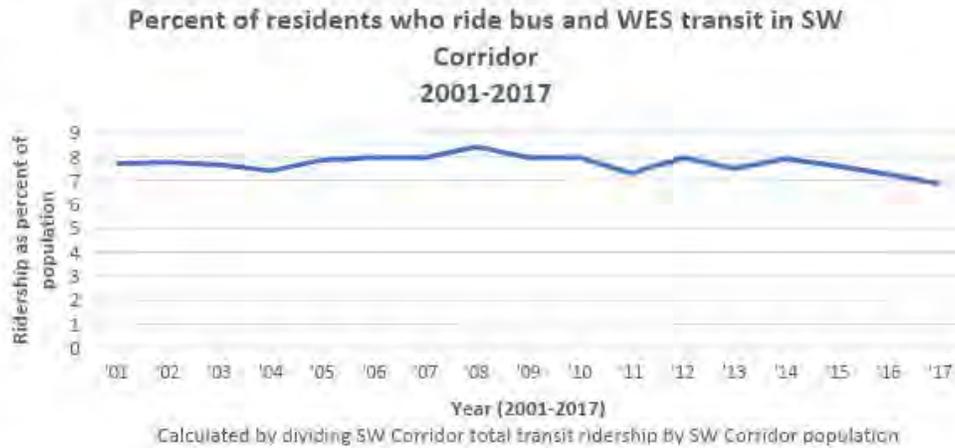
Figure 13

**Average weekday transit ridership on SW Corridor transit routes
2001-2017**



Even here, the overall increase is owed to the fact that total ridership from 2009-2017 did not decline as quickly as it increased from 2001-2008. The overall increase (+3.3%) was still outpaced by population growth, which yet again led to a decrease in transit ridership proportional to population, seen in **Figure 14**:

Figure 14



Another way to calculate transit ridership in the Southwest Corridor is to conduct telephone surveys. For several decades the City of Portland Auditor conducted such surveys annually, known as the Community Survey and Service Efforts and Accomplishments reports (these were discontinued after 2016 for cost reasons). Those surveys recorded a steady decline in the percent of individuals in the Southwest Corridor who self-reported public transit as their main mode of transportation, as seen in **Figure 15**:

Figure 15



According to the 2010 US Census, the average household size for each city along the Southwest Corridor (Tualatin, Tigard, Lake Oswego) was between 2.29 and 2.6 with 70-81% of households comprised of three or fewer people. Thus the decrease in ridership proportional to the population cannot be attributed to newly arrived families with several young children (who would not take public transit).

There are viable ways to work towards the desired goals of the Southwest Corridor Project without adding light rail. Bus ridership increased from 2001-2008. Population increased by 8% while overall bus ridership increased by 18%, indicating that increased bus access can in fact provide the desired transit options. Increased bus service, whether through more buses, expanded operating times, or additional express service, would also cost far less than \$2.5 billion.

Further, this cost-effective option would create less traffic congestion than building the proposed rail line.

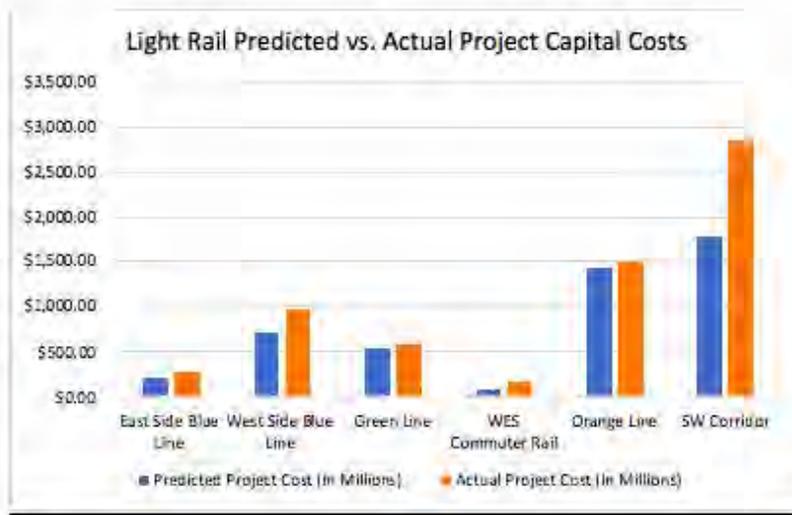
Underestimated Capital Costs

Table S-5, "Estimated Project Capital and Operating Costs" in Section S.8 "Evaluation of Alternatives" estimates the total capital cost range of the full corridor project to be between \$2.64 and \$2.86 billion dollars in year-of-expenditure (2024) dollars. Past light rail projects have consistently underestimated costs in the projects' DEIS, SDEIS, or FEIS (**Figure 16**). The eastside blue line, westside blue line, green line, WES commuter rail, and orange line all demonstrate this.

The predicted capital cost of the Southwest Corridor project has already been increased by a billion dollars, from \$1.8 billion in 2016 to its current prediction in 2018. If the pattern of higher actual capital costs on light rail projects continues, then the Southwest Corridor project capital cost will continue to increase throughout this process.

This is a problem that has plagued light rail construction for many decades, both in Portland and elsewhere. As noted by Dr. Don Pickrell in his classic study from 1989, "capital costs that differ markedly from their anticipated level can substantially increase the financial burden on the government program and agency funding the project, resulting in postponement or cancellation of other projects competing for its support."⁴

Figure 16



The estimated cost in 2016 for the Southwest Corridor project was 1.8 billion dollars. In 2018, the DEIS increased that estimate to \$2.64 - \$2.86 billion. This is an increase of \$1.06 billion within a two year timespan. (Figure 17). Metro claims the earlier estimate was based on 2016 dollars instead of 2024 dollars and has less detail, which is why it was lower. This raises the question of how 10 years of inflation increases the price by over \$1 billion.

⁴ Dr. Don Pickrell, "Urban Rail Transit Projects: Forecast Versus Actual Ridership and Costs", Urban Mass Transportation Administration, October 1989, vi.

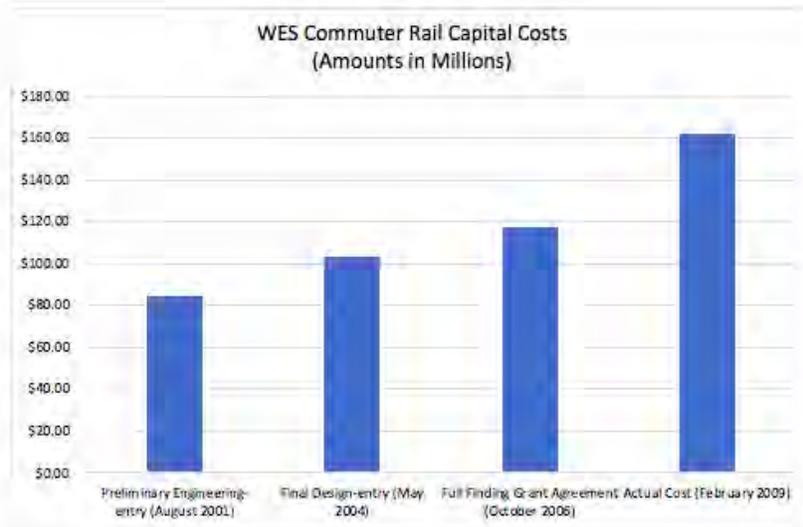
Figure 17



WES Commuter Rail

The year-of-expenditure (YOE) prediction for the project consistently underestimated the actual costs of the WES commuter rail, which turned out to be \$162 million dollars in YOE dollars. Predicted cost at the preliminary engineering stage (August 2001) was \$84.8 million (48% below actual); at final design (May 2004) \$103.5 million (36% below actual); and at full funding grant agreement (October 2006) \$117.3 (28% below actual). These numbers are compared below in **Figure 18**.

Figure 18



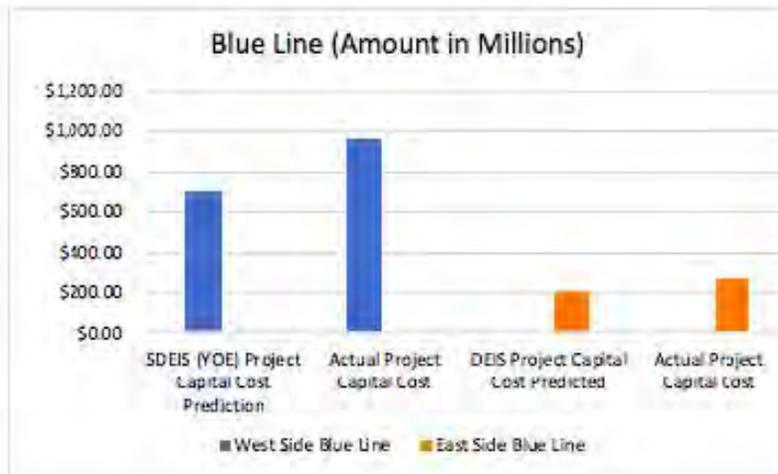
Blue Line

East Side: The Banfield EIS (1980) estimated the project costs to be \$208.1 million in 1980 dollars. The actual cost of the project was \$214 million in 1978 dollars, or \$270.45 million in 1980. Both costs are well above what TriMet originally projected.

West Side: The westside SDEIS (1991) predicted that the light rail to 185th in Hillsboro (the original destination) would cost \$439.5 million - \$501.6 million in 1990 dollars. YOE cost estimates for the project were \$703 million. The actual cost of the project was \$963.5 million in 1998. TriMet’s decision to extend the line to downtown Hillsboro after the release of the SDEIS accounts for some of the increased cost.

The difference in capital costs for both sides of the Blue Line are shown below in **Figure 19**.

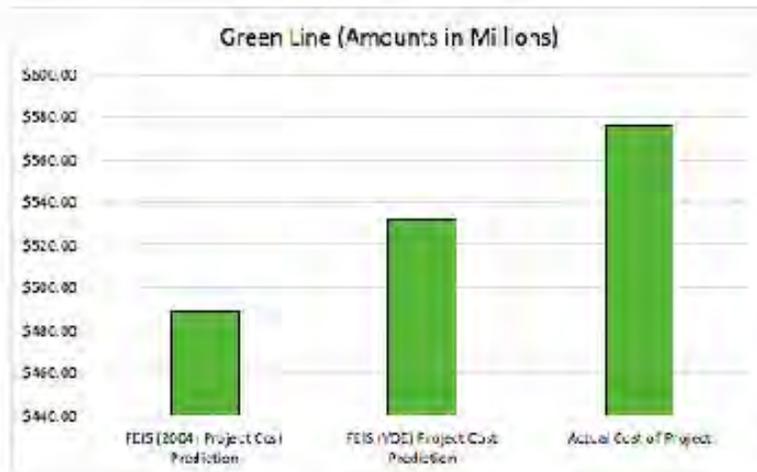
Figure 19



Green Line (South Corridor: I-205 to Mall)

The proposed cost for the green line project in 2004 was \$489.12 million (\$532.24 million in YOE). The actual cost for the project when it was implemented in 2009 was \$575.7 million (Figure 20).

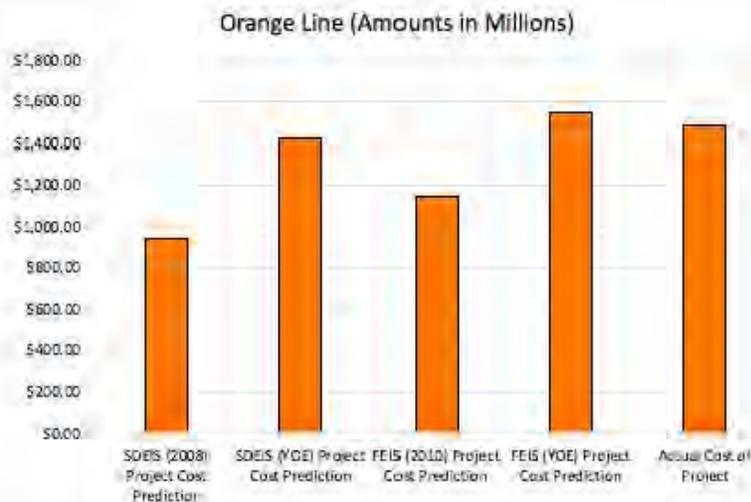
Figure 20



Orange Line (Portland-Milwaukie Light Rail)

The South Corridor SDEIS (2008) estimated costs for the Orange line from LPA - Park at \$942.5 million in 2007 dollars or \$1.4 billion in the year of expenditure (YOE). The FEIS (2010), released 2 years later, predicted the Subtotal LPA - Park Ave would cost \$1.15 billion in 2010 dollars (or roughly \$1.08 billion in 2007 dollars). The total for YOE was estimated to be \$1.55 billion (Figure 21). The actual cost of this project was \$1.49 billion. The actual cost was less than the prediction in 2010, but was \$90 million greater than the predicted capital cost in 2008.

Figure 21



Loss of Parking

Section 3.2.6, "Street Parking," claims that "demand for parking would be expected to increase" (3-22), however the Southwest Corridor plan would eliminate 166 number of parking spaces in the corridor to accommodate light rail. In locations where the alignment alternative would operate near street rights of way, on-street parking would be eliminated. Residents in the corridor predominantly drive cars rather than public transportation, so they rely on the availability of parking.

Segment A would take away either **16 parking spaces on Duniway Park** or **21 parking residential zone permit parking spaces** on SW Naito depending on the alternative chosen, even though the DEIS states that "eliminating the spaces would increase demand for remaining on-street spaces on nearby streets" (3-23).

Segment B would see **61 on-street parking spaces on SW Barbur eliminated** with the preferred alternative along SW Multnomah Boulevard.

In segment C, **89 spaces would be eliminated** with the preferred alternative on SW 70th, SW Beveland Street, and SW Ash Avenue.

If the preferred alternative is chosen for all three segments, then **a total of 166 parking spaces will be eliminated**. This would induce parking on side streets or in residential neighborhoods.

The DEIS claims that this wouldn't be an issue as "the combination of improved transit and improved bicycle and pedestrian facilities could help offset the impact" (3-23). However, this seems unlikely as light rail ridership is declining and the majority of those traveling in the corridor do so in a motor vehicle.

Similar claims were made by local transportation officials in the Sellwood Bridge EIS regarding the deliberate under-building of road capacity by Multnomah County. The DEIS asserted multiple times that congestion in the Tacoma Street-Sellwood Bridge corridor would be mitigated by substantial increases transit use, biking and walking, due to the bridge design. In fact, that never happened, and traffic congestion in the Tacoma Street corridor is worse today than it was a decade ago.

Loss of Road Capacity

Segment A: The loss of traffic lanes is discussed in detail in Attachment B - Transportation Impacts Results Report. In segment A, one northbound lane on SW Barbur between SW Naito Pkwy and SW Broadway would be converted to a transit-only lane. There are only two northbound lanes on SW Barbur in this segment, thus drivers heading towards the city center would be restricted to only one lane.

Along this segment, the plan would also convert all bike lanes (which are five - six feet wide) currently along Barbur to eight foot bike lanes on either side of the street, taking away four to six feet of vehicle roadway. The EIS claims that Barbur would be widened south of SW Hooker Street to accommodate the addition of sidewalks and bike lanes, but nowhere does it state by how much.

A total of seven intersections in the preferred segment A alternative will be negatively affected by the light rail project. Six left turn lanes will be eliminated (SW 4th @ SW Lincoln, SW Grant, SW Bancroft, SW Sheridan, SW /Caruthers/Broadway, and SW Barbur @ SW Hamilton), two through lanes will be eliminated (SW 4th @ Sheridan and SW Barbur @ SW Bancroft), one right turn lane will be eliminated (SW Barbur @ SW Bancroft), and the access to both View Point Terrace Street and eastbound SW Hamilton will be eliminated from Barbur due to light rail stations.

Segment B: Changes made to Segment B, described in Attachment B section 4.3.1 and 4.3.4, include widening SW Barbur in order to accommodate light rail in the center. 8-foot-wide bike lanes would be added in both directions between SW Brier Place and SW 60th Avenue. Bike lanes on Barbur are currently between 5-6 feet. If bike lane is currently 6 feet either way, they will take away 4 feet from the road the entire length of Barbur. If the length is 5 feet, 6 feet will be taken away from drivers. While the DEIS claims that SW Barbur would be widened to accommodate new bike lanes and sidewalks, nowhere does it say how much Barbur will be widened nor how wide the sidewalks are expected to be.

Three intersections would be affected in Segment B. The left turn lanes onto SW Barbur from SW 22nd in both directions will be eliminated (at the intersection SW Barbur @ SW 22nd). The right turn lanes from SW Barbur in both directions onto SW Custer and SW Multnomah as well as the right turn lane onto SW Barbur from Multnomah will be eliminated due to the proposed construction of a light rail station at the SW Barbur @ SW Custer/Multnomah intersection. Finally, the access to Barbur from SW 3rd will be eliminated due to the placement of the light rail route (at the intersection SW Barbur @ SW 3rd).

Segment C: The changes to segment C are described in 5.3.1 and 5.3.4 in Attachment B to the DEIS. Segment C extends from the intersection of SW 68th Parkway and SW Atlanta Street to near Bridgeport Village. The preferred alternative would run along existing or new roads between the Tigard Triangle and downtown Tigard, and then would follow the freight rail and WES tracks before turning east to run along I-5 to Bridgeport. 2 stations would be in the Tigard Triangle, one would be in downtown Tigard, one along I-5 at SW Bonita Road, SW Upper Boones Ferry Road and Bridgeport Village.

The only intersection change in segment C between the no-build and light rail options would come at SW Hall Blvd @ Ash/Knoll. Here the turn from Hall onto Knoll would be eliminated due to the light rail route cutting across the entrance of Knoll Dr. The light rail will continue across Hall, through the buildings across from Knoll Dr. and down Ash Avenue. There will only be one through lane in either direction on Hall at this intersection with the light rail alternative.

In all three proposed segments, the DEIS proposes creating 8-foot-wide bike lanes where there are none or increasing the width if such a lane already exists. It also proposes adding in sidewalks where there are none along SW Barbur. There is no mention as to how wide the sidewalks will be, nor does it mention how much SW Barbur will be widened to accommodate these new additions. It is critical to calculate these changes so that motor vehicle drivers know how much of the current roadway will be taken from them. Taking away a motor vehicle lane on a heavily used road (SW Barbur) to serve light rail would increase traffic in the corridor, not reduce it as the DEIS claims.

PCC Sylvania-Shuttle

The proposed PCC Sylvania-Shuttle described on page 2-20 in section 2.3 of the DEIS would provide a small amount of ridership for a high cost based upon similar shuttle services in the region. One of the proposed shuttles would transport riders from the 53rd light rail stop to PCC-Sylvania, a distance of .5 miles. Table 4.4-3 of the DEIS admits that the impact from the addition of this shuttle would be offset by improved sidewalks, bike lanes and street lighting.

Clackamas Community College has run their own version of the proposed shuttle between their Harmony and Oregon City campuses and the Green Line station at the Clackamas Town Center since 2011. The CCC shuttle is fully funded by the college and is operated by a private business.

On average, only 217 individual trips were taken per day on the three shuttles by students during the spring of 2018. There were 7,974 students at both the Oregon City and Harmony campuses during that same time period. If each individual trip was completed by a different student than the shuttle was utilized by 2.72% of the student population. If each trip was part of a round trip, then the shuttle would have only been used by 1.36% of the student population. The cost to run three shuttles was \$180,000 for the 2017-2018 school year.

The proposed shuttle from the Barbur Transit Center would use five standard 40-foot TriMet buses to operate, which would have a higher cost than the three van-sized shuttle buses used by CCC. CCC has demonstrated that a community college can run their shuttle service without the involvement of TriMet or the use of taxpayer dollars. Based upon the CCC shuttle, the PCC-Sylvania Shuttle would benefit very few people for at high cost to taxpayers.

Frequency of Service

The Draft EIS for the Southwest Corridor Light Rail Project states that the through route configuration would include nine trains per hour traveling to downtown Tigard during peak periods in 2035, with headways as low as 6.7 minutes in between operation of trains⁵. However, these predictions are implausible given the performance of current light rail installations. Even the less ambitious projections of 7.5 minute headways for previous lines are currently nowhere close to being met.

By averaging the times between stops at a single station in both directions between peak hours of 6:00 a.m.-9:00 a.m. and 3:00 p.m.-6:00 p.m. according to weekday MAX schedules on Trimet's website, we gain the best estimation of actual MAX headways during June 2018. Based on these calculations, light rail service operation has consistently fallen short of the frequencies promised in past environmental impact statements.

The Orange Line EIS predicted that by 2030, trains along the corridor would operate every 7.5 minutes⁶, requiring 8 trains per hour to stop during peak periods. In the opening year 2016, the

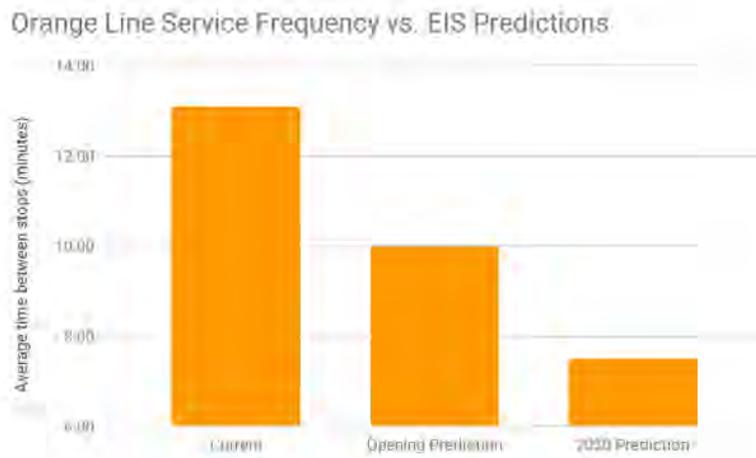
⁵ Southwest Corridor Light Rail Project Draft Environmental Impact Statement, June 2018. Chapter 3, page 11.

⁶ Portland-Milwaukie Light Rail Project Final Environmental Impact Statement, October 2010. Chapter 2, page 28.

Orange Line was intended to operate with 10-minute headways⁷. In 2018, that frequency has not been met, with MAX schedules showing average weekday peak-hour headways of 13.1 minutes.

Figure 22 shows Orange Line headways during peak periods based on June 2018 schedules at the SE Park Ave MAX Station contrasted with earlier predictions of service frequency,

Figure 22



In similar fashion, TriMet promised FTA that the Green Line would operate every 7.5 minutes by 2025⁸, but has failed to live up even to promises of 10-minute headways in its opening year⁹. An FTA Before-and-After Study of the Green Line's performance stated that "[t]he project opened with 15-minute intervals throughout the day and 35-minute intervals in the evenings,"¹⁰ in sharp contrast to initial projections. 2018 MAX schedules at Clackamas Town Center TC MAX Station confirm that the Green Line has been operating with an average of 15.1 minutes between stops, as shown in **Figure 23**.

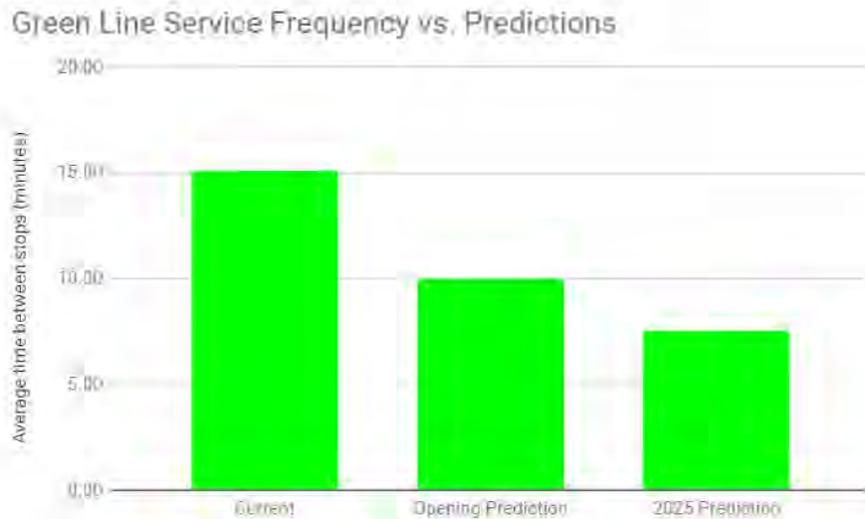
⁷ Portland-Milwaukie Light Rail Transit Project Full Funding Grant Agreement, October 2011. Attachment 1.

⁸ South Corridor I-205/Portland Mall Light Rail Project Final Environmental Impact Statement, November 2004. Chapter 4, page 12.

⁹ Green Line Light Rail Project Before-and-After Study, 2014. Federal Transit Administration. Page 6.

¹⁰ Ibid.

Figure 23



MAX service frequency has consistently underperformed for nearly its entire history. The only MAX line that has been living up to its projections is the Red Line, with a much lower bar of 15 minute headways by 2015¹¹.

The 1991 SDEIS for the Westside Corridor Blue Line project stated that "[t]wo-car trains would operate every five minutes east of the Beaverton Transit Center"¹² by the year 2005, but in 2018, these trains only operate every 9.1 minutes.

Likewise, the Yellow Line EIS promised headways of 7.5 minutes during peak travel periods in 2020¹³ and 10-minute headways in opening year 2005¹⁴, but Yellow Line trains offer only half that level of service in 2018, with trains at N Prescott St Station operating every 15 minutes on

¹¹ MAX Extension to the Portland Airport Environmental Assessment, December 1998. Chapter 3, page 10.

¹² Westside Corridor Project Supplemental Draft Environmental Impact Statement, January 1991. Chapter 4, 1.

¹³ North Corridor Interstate MAX Light Rail Project Final Environmental Impact Statement Executive Summary, October 1999. Section 3.1.2.

¹⁴ North Corridor Interstate MAX Light Rail Project Final Environmental Impact Statement, October 1999. Chapter 1, page 2.

average. **Figure 24** shows the consistent failure of MAX lines to offer the level of frequency promised during the planning process.

Figure 24



It is unreasonable to expect light rail along the Southwest corridor to operate at 6.7 minute headways during peak periods. No previous light rail installation has met the benchmark of 7.5 minutes, and only the Blue Line has managed to offer even 10 minute headways. MAX has yet to live up to expectations of service frequency, and the promise of nine trains per hour in the Southwest Corridor has no basis in reality.

Travel Times

According to the EIS, light rail in the Southwest Corridor “would reduce the PM peak-hour in-vehicle transit travel time from Portland State University to Bridgeport Village from 38 minutes (via TriMet bus line 96 Tualatin Express) to 29 minutes with the Branched Route or 33 minutes

with the Through Route.”¹⁵ This prediction is implausible given the track record of current MAX lines.

Table 1 shows the travel times between selected Orange Line stops according to TriMet MAX schedules in 2018 compared to EIS predictions for 2030.¹⁶ Assuming 100% on-time performance, Orange Line travel times are currently 4.8 minutes longer on average than predicted in the Portland-Milwaukie Light Rail Project EIS.

Table 1

Orange Line			
Distance	South Corridor EIS Predicted Travel Time in 2030	Actual PM Peak Period Travel Time in 2018	Scheduled Stops (PM Peak-hour)
Pioneer Square to Milwaukie Park Ave	26	32	5:04 - 5:36
PSU to Milwaukie Park Ave	20	26	5:10 - 5:36
South Waterfront to Milwaukie Park Avenue	16	21	5:15 - 5:36
Pioneer Square to Lake Rd	24	29	5:04 - 5:33
PSU to Lake Rd	19	23	5:10 - 5:33
South Waterfront to Lake Rd	15	18	5:15 - 5:33

Similarly, Green Line has lagged behind in travel times, with actual travel times 4.7 minutes longer on average than predicted for 2025 in the South Corridor FEIS.¹⁷ **Table 2** shows Green Line travel times compared to EIS predictions.

¹⁵ Southwest Corridor Light Rail Project Draft Environmental Impact Statement, June 2018. Chapter 3, page 12.

¹⁶ Portland-Milwaukie Light Rail Project Final Environmental Impact Statement, October 2010. Chapter 4, page 18.

¹⁷ South Corridor I-205/Portland Mall Light Rail Project Final Environmental Impact Statement, November 2004. Chapter 4, page 14.

Table 2

Green Line			
Distance	South Corridor FEIS I- 205 Year 2025 Predicted Travel Time	Actual PM Peak Period Travel Time in 2018	Scheduled Stops (PM Peak-hour)
Pioneer Square to Clackamas TC	38	43	5:08 - 5:51
PSU to Clackamas TC	42	48	5:03 - 5:51
Rose Quarter to Clackamas TC	30	33	5:18 - 5:51
Pioneer Square to Lents	31	36	5:08 - 5:44
PSU to Lents	35	41	5:03 - 5:44
Rose Quarter to Lents	23	26	5:18 - 5:44

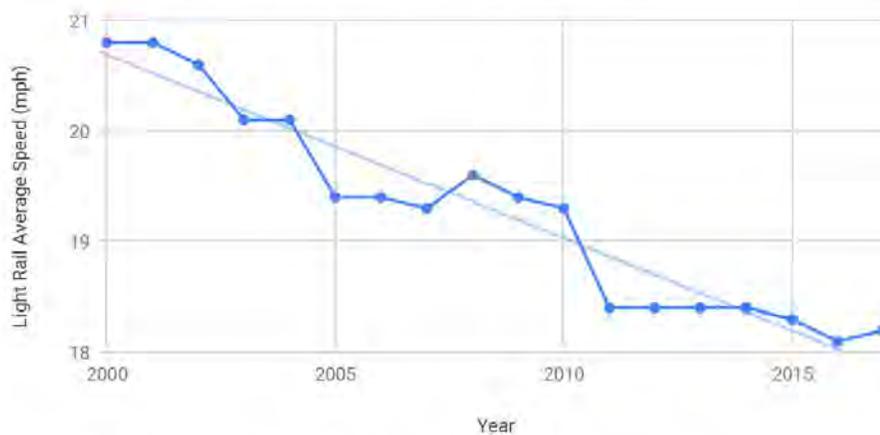
If MAX lines increased in speed over the next few years, perhaps these gaps could be closed in time to meet projections. However, given trends since 2000, this is highly unlikely. The average speed of light rail has been steadily decreasing,¹⁸ as seen in **Figure 25**.

¹⁸ TriMet Service and Ridership Statistics, October 2017.

Figure 25

Light Rail Average Speed (mph) vs. Year

Source: TriMet



Taking the data into consideration, the Southwest Corridor EIS projections for transit travel time are likely overestimated. If the new light rail line has travel times nearly 5 minutes longer than predicted, as current lines do, the advantage over bus service will be negligible.

Service Efficiency

A stated purpose of expanding light rail to the Southwest Corridor is to “provide light rail transit service that is cost-effective to build and operate with limited local resources,”¹⁹ but statistics have shown TriMet light rail operation to be less cost effective than bus. While measures of Operating Expense per Vehicle Revenue Mile and Operating Expense per Vehicle Revenue Hour have increased at roughly the same rate for light rail and bus, light rail consistently ranks above bus in both measures, as seen in **Figure 26** and **Figure 27**.²⁰

Figure 26

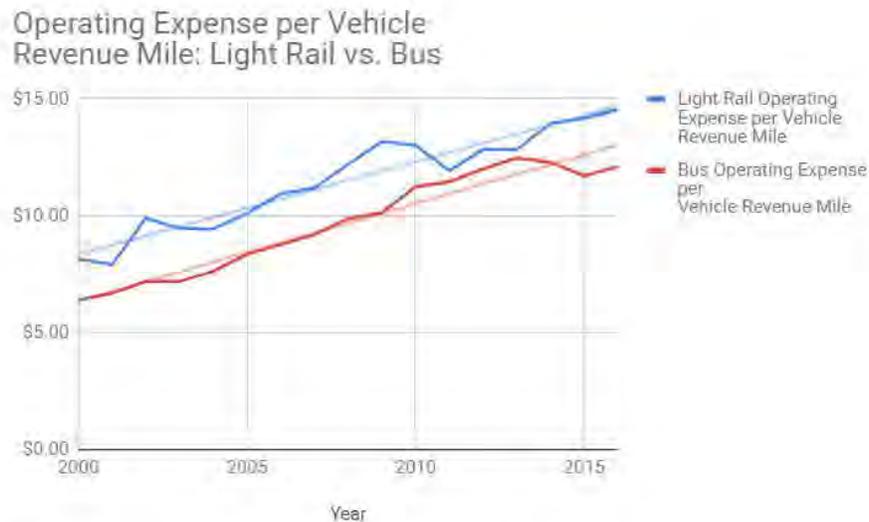
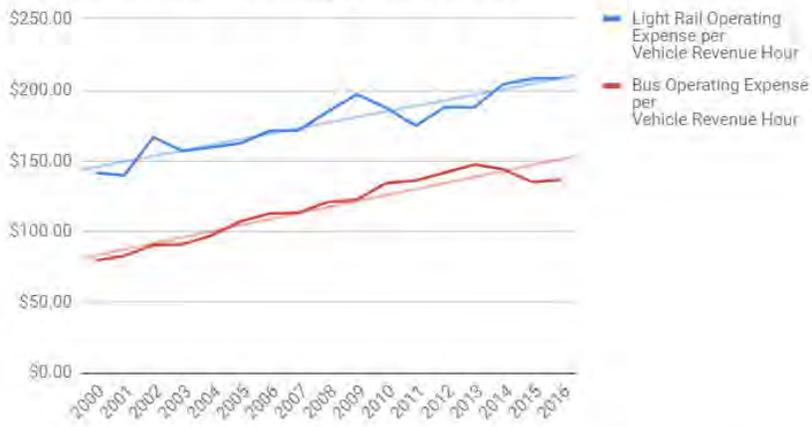


Figure 27

¹⁹ Southwest Corridor Light Rail Project Draft Environmental Impact Statement, June 2018. Chapter 1, page 5.

²⁰ National Transit Database, Federal Highway Administration. Region 10 Transit Agency Profiles 2000-2016.

Operating Expense per Vehicle Revenue Hour: Light Rail vs. Bus

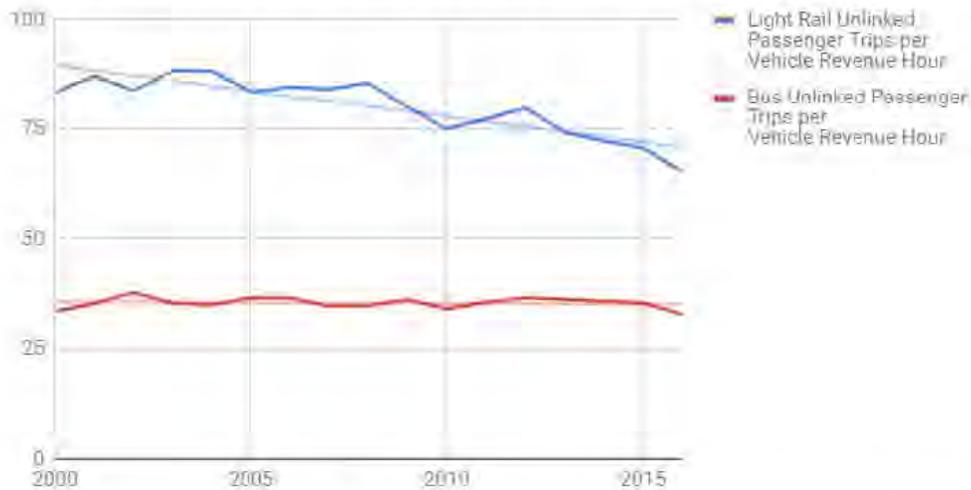


Operating Expenses per Unlinked Passenger Trip are higher for bus than light rail, likely due to the higher carrying capacity of MAX cars, but as **Figure 28** shows, Unlinked Passenger Trips per Vehicle Revenue Hour have been trending downward for light rail while staying steady for bus.²¹

Figure 28

²¹ Ibid.

Light Rail Unlinked Passenger Trips per Vehicle Revenue Hour and Bus Unlinked Passenger Trips per Vehicle Revenue Hour



Light rail has not shown itself to be comparatively cost-effective in operation. Why assume that the Southwest Corridor Project will perform significantly better than light rail already present in the Portland Metro region?

Overestimation of VMT Reduction

In Chapter 4, the Draft EIS claims that the Light Rail Alternative would result in total driving of 51,415,071 daily vehicle miles traveled (DVMT) for passenger vehicles in the Metro Region in 2035, down from a projected 51,474,286 daily VMT for the No-Build Alternative.²² Through increased mode-sharing, the Southwest Corridor Project is anticipated to reduce car travel by 59,215 daily miles. However, light rail in Portland has yet to yield the significant passenger vehicle travel reductions initially hoped for.

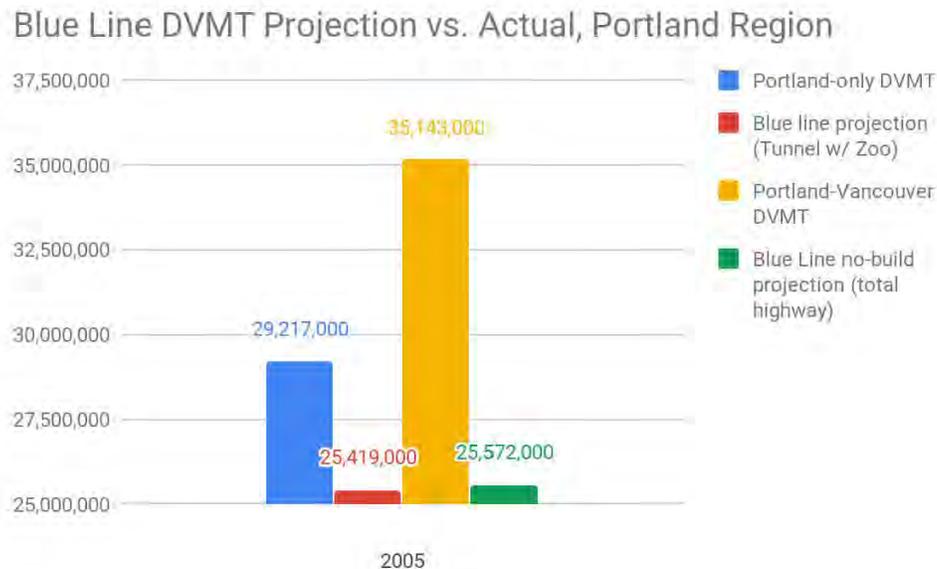
The 1991 SDEIS for the Westside Corridor Blue Line project claimed that the light rail installation would reduce Total Highway-related VMT by 153,000 in 2005, projecting 25,419,000 VMT compared to 25,572,000 VMT for the No-Build Alternative.²³ However, information from the Federal Highway Administration shows that actual DVMT surpassed both these projections, with DVMT in the Portland Federal-Aid Urbanized Area reaching 29,217,000 and the greater

²² Southwest Corridor Light Rail Project Draft Environmental Impact Statement, June 2018. Chapter 4, page 129.

²³ Westside Corridor Project Supplemental Draft Environmental Impact Statement, January 1991. Chapter 4, page 1.

Portland-Vancouver region (including most of the Metro area) displaying 35,143,000 DVMT.²⁴ EIS projections for the Blue Line compared to actual results from 2005 are displayed in **Figure 29**.

Figure 29



The projections of more recently constructed MAX lines cannot be accurately examined until DVMT statistics from 2020 onward are published, but current results show insufficient reduction in VMT to meet Blue Line estimations. If a goal of light rail is to get people out of their cars, this hasn't worked as well as expected.

Actual VMT in 2005 was 3.8 million higher than what the Blue Line's SDEIS promised. If the Blue Line couldn't reduce VMT in the Portland Region by 153,000 (or seemingly at all), how can the Southwest Corridor Project reduce VMT by 59,215?

Affected Properties

According to the draft EIS, a full-corridor project would "acquire and displace 78 to 293 residential units" and "have acquisitions affecting 106 to 156 businesses or

²⁴ Highway Statistics 2005. Federal Highway Administration. Roadway Extent, Characteristics, and Performance, Table HM-72.

institutions and 961 to 1,990 employees.”²⁵ The plan for the Southwest Corridor includes compensation and relocation assistance for displaced businesses and property owners, but fails to address the full costs of the light rail’s displacement.

Regardless of compensation, the proposed property acquisitions will negatively impact homeowners with significant financial and personal investments in their property, as well as businesses who may have clientele, local connections, or other factors that are dependent on their current location. Condemning these properties introduces an unnecessary shock to residents’ stability.

The planners of the project seem confident in their ability to successfully mitigate the effects of lost property, but cannot possibly understand the needs of residents and businesses better than these residents and businesses themselves. By what standard are the proposed transit improvements better than allowing people to stay where they currently live?

In considering the effects of acquiring these properties, we must also consider the effects on opportunities for future development. Converting private property to public property is likely to make it harder for future homeowners and businesses to find space - these acquisitions would reduce the overall supply of property available in the area, and with no guarantee of future availability, we lose the opportunity for private development in these areas. The costs of lost property will be felt most immediately by current property owners and renters, but the opportunity costs for the area as a whole reach much further into the future.

Reducing the supply of property in the Southwest Corridor may result in increased housing prices, given that less space will be available to live in. In the midst of a housing crisis, how can demolishing residential property do anything but exacerbate the situation?

These effects are even more prominent considered alongside zoning requirements that mandate high-density projects near light rail. These requirements will increase the cost of new housing, further reducing supply and raising prices.

Conclusion

An EIS by definition consists almost entirely of forecasts, most of which are destined to be wrong because predicting the future is difficult. However, when key forecasts are consistently skewed in the same direction for over 30 years, it suggests a troubling trend: that transit planners are deliberately creating forecasts that are most favorable to procuring political and financial support necessary to proceed with the project.

²⁵ Southwest Corridor Light Rail Project Draft Environmental Impact Statement, June 2018. Summary, page 20.

Specifically, TriMet rail construction projects have consistently over-estimated ridership and peak-hour service levels, while under-estimating construction and operating costs. They also claim to reduce traffic congestion and increase the use of alternative modes; yet none of those things has occurred after more than three decades of light rail operation.

It's unlikely that these flaws can be addressed in the FEIS. For those and other reasons, we urge TriMet, Metro, and JPACT to adopt the no-build alternative.

Sincerely,

John A. Charles, Jr.
Justus Armstrong
Miranda Bonifield
Rachel Dawson
Jakob Puckett

1 Which someone else brought up, and I've
2 been thinking about it too, there have been some
3 concerns -- when I turn on the 11:00 o'clock news
4 and I hear Gresham and the MAX station out there,
5 murders, rapes, awful stuff going on out in
6 Hillsboro at the end of the line. Do we want
7 Bridgeport to -- I don't know what's going on out
8 there. I haven't been out there, but I know if you
9 get off a train at night and there's a warm,
10 welcoming restaurant there, it's going to add
11 security. Consider that while we work together on
12 making this right. Thank you.

13 COUNCILOR DIRKSEN: John Charles and then
14 Linda Monahan.

15 MR. CHARLES: Thank you, Mr. Chairman. My
16 name is John Charles, President of Cascade Policy
17 Institute, a non-profit policy research
18 organization. I'm also a homeowner here in Tigard.
19 When I came before you started, you were running the
20 loop of the PowerPoint slide above. And one of the
21 slides was a standard talking point that's been
22 going on about 30 years suggesting that light rail
23 is so much more reliable than bus service. And
24 that's intuitive, I get it. It has its own reserved
25 right-of-way and buses are stopped on those roads

1 that are all getting more and more crowded. So I can
2 understand how you might think that if you really,
3 really have to get somewhere on transit, you better
4 take light rail not the bus.

5 Sadly there's very little evidence to
6 support that long-time assertion. TriMet itself
7 produces monthly performance reports measuring
8 hundreds of metrics quite assiduously. If you read
9 your own performance reports and you plot them, you
10 can see about 15 years ago light rail did have a bit
11 of an advantage for on-time performance over buses.
12 And for me as a transit user, on-time performance is
13 a pretty important metric.

14 Since 2003, the on-time performance of
15 light rail has more or less consistently gone down
16 to the point where three years ago, bus and light
17 rail had the exact same on-time performance. Both
18 have rebounded recently, but as of today, light rail
19 is on time 88 percent of the time, and the bus 86
20 percent of the time. Okay. Seriously, \$2.5 billion
21 for a tiny fraction of a gain? I mean, that's
22 highly questionable.

23 Second common assertion is the light rail
24 doesn't require very many people to operate it
25 because, of course, you see one person up front

NAEGELI
DEPOSITION AND TRIAL



(800)528-3335
NAEGELIUSA.COM

1 operating it, two cars pulling people. It must have
2 a labor advantage over buses. Again, very
3 intuitive. I've heard Neil McFarland say on more
4 than one occasion over the last decade, we can't --
5 "we" -- TriMet -- we can't afford not to build more
6 light rail because we save so much money in
7 operating costs.

8 Sadly, there's very little evidence to
9 support that claim. Reports show that light rail
10 has about 80 percent more demands for full-time
11 equivalent operators per peak vehicle than buses,
12 and again, the gap is growing. It's going in the
13 wrong direction. So you might have some
14 rationalizations ultimately for picking one of the
15 build alternatives, but in terms of reliability and
16 savings in operations costs, those are not reasons
17 to go forward with this light rail project. Thank
18 you.

19 **COUNCILOR DIRKSEN:** Linda Monahan followed
20 by Philip Thornburg.

21 **MS. MONAHAN:** My name is Linda Monahan, M-
22 O-N-A-H-A-N, and I'm a candidate for Tigard Mayor.
23 I'll be very brief.

24 I have some remarks about light rail
25 generally and DEIS specifically. I do not support

NAEGELI
DEPOSITION AND TRIAL



(800)528-3335
NAEGELIUSA.COM



**COALITION FOR SW MAX
RAILROAD OPTIONS**
Preserving Land & Jobs

Coalition Members

- Ascend Holdings
- Atiyeh Bros.
- Bonita Pioneer Packaging
- Burgerville
- Curtiss-Wright Gerber
- Holiday Inn Express
- Landmark LLC
- Paul Schatz Furniture
- Portland Clinic
- Umpqua Bank
- United Rentals

July 30, 2018

Metro Council President Tom Hughes / TriMet General Manager Doug Kelsey
Southwest Corridor DEIS

The Coalition for SW MAX Railroad Options appreciates the commitment and analysis conducted to recommend alignment options for the proposed light rail line through Tigard and onto Tualatin. We are pleased that the project partner staff have recommended a Railroad route (C2) within Segment C – Tigard and Tualatin - in the Initial Route Proposal (“IRP”) that was incorporated into the DEIS. The I-5 route would have resulted in significant economic and social impacts to Coalition and other neighboring businesses.

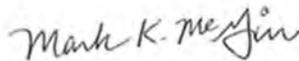
The 12 businesses represented by the Coalition unanimously support the recommendations included in the DEIS. With the IRP, staff recommended the “through” route which travels alongside existing rail tracks. Our review of the DEIS and its attachments fully and accurately support this IRP recommendation included in the DEIS. The railroad route (C2), which we have been a proponent of all along, is the best route for the following reasons:

- **Faster travel time**
- **Most cost effective to operate**
- **Lowest capital costs**
- **Displaces fewest employees and businesses and provides for significant economic development**
- **Maintains projected ridership as anticipated**
- **Most comprehensive multimodal transportation plan with Tigard-Tualatin connectivity**
- **Most accessible to the residents and transit dependent people of Tigard**
- **Best support of the Tigard Triangle Strategic Plan**
- **Lowest impact on City of Tigard property tax base from displacements**
- **Least number of acres of land use conversion**
- **Avoids a critical traffic impact at Hall Blvd. near Pacific Highway**

Our support is consistent with Metro, TriMet and other jurisdictional planning staff & engineers for this important project for the region.

On behalf of the Coalition for SW MAX Railroad Options, we request all deciding parties from this point forward support the IRP; the DEIS and its findings, in making the IRP the Preferred Alternative (PA), and moving this work into the FEIS (Final EIS) and the Regional Transit Plan.

Thank you very much,



Mark McGirr,
President, Atiyeh Brothers, Inc.



Dick Clark,
CEO, The Portland Clinic

Coalition for SW MAX Railroad Options
Contact: Debra Dunn, Synergy Resources Group
Ph. 971-202-7262 • Email: debra@synergyresourcesgroup.com

O05: Crestwood Neighborhood Association

Email:

From: [Tony Hansen](#)
To: [swcorridordeis](#)
Cc: [Marianne Fitzgerald](#); [Teresa Boyle](#); [John Gillam](#); [Chris Ford](#); [Eryn Kehe](#); [Commissioner Dan Saltzman](#); [Eric Engstrom](#); [Joan Frederiksen](#)
Subject: Crestwood NA SW Corridor Plan DEIS comments
Date: Wednesday, July 25, 2018 11:27:03 PM
Attachments: [Crestwood NA SWC DEIS Comments 20180725.docx](#)

Please consider the attached comments on the SWC DEIS as you deliberate on the Locally Preferred Alternative.

Sincerely,

Tony Hansen

Tony Hansen, President



www.swni.org/Crestwood



CRESTWOOD

Neighborhood Association

July 25, 2018

Southwest Corridor Plan Steering Committee:
Metro
600 NE Grand Avenue
Portland, OR 97232

Re: Southwest Corridor Plan DEIS

Dear Members of the Southwest Corridor Plan Steering Committee:

Crestwood Neighborhood Association is one of seventeen neighborhoods within Southwest Portland. We had been in favor of the SW Corridor Light Rail Transit Plan until the most recent Initial Route Proposal that destroys livability within our residential neighborhood and West Portland Town Center. Please consider these comments as you deliberate on the future alignment of the SW Corridor Plan.

Crestwood Neighborhood Association supports Alternative B1 (Center Barbur) and reconstruction of the intersection of SW Barbur and SW Capitol Highway.

To meet the stated goals of the DEIS in 1.3 "Need for the Project", Metro and its partners must make the complex changes to the many intersections of Barbur Blvd, I-5, SW Capitol Highway, SW Taylors Ferry and SW Huber to make it safer for everyone—motor vehicles, pedestrians, bicyclists, transit and freight—that travel through the West Portland Crossroads Town Center. In 2010 residents renamed West Portland Town Center the "West Portland Crossroads" to reflect the dominance of transportation issues that inhibit the Town Center from realizing its potential. The Barbur Concept Plan vision for the Crossroads focus area is that the congested intersections of the Crossroads are redesigned to improve traffic flow, but also with improved pedestrian and bike safety. The Barbur Concept Plan is referenced heavily in the SWC DEIS Project Introduction and as a key document in the SWC DEIS Planning and Policy Framework.

The Barbur Concept Plan notes that there is no way to solve the transportation circulation in the Crossroads one intersection at a time. In 2015 ODOT's Barbur Road Safety Audit recommended a long list of improvements needed at one of the least safe intersections in the City of Portland (Vision Zero). One of the long-term recommendations is the need for an intersection/interchange preliminary design study to identify future needs at this location and identify property impacts. Instead ODOT decided to

implement a near-term “jughandle” solution that reroutes traffic from Barbur onto local streets that will surely make conditions less safe at the SW Taylors Ferry and SW Capitol Highway intersection. Because of all of these complex transportation issues within Crossroads, the DEIS motor vehicle traffic analyses in Chapter 3 must study all seven intersections in order to assess traffic impacts in the Crossroads and consider long term investments needed for the safety of all people traveling through this intersection.

The Crossroads intersection was constructed in 1959 and is not likely to survive an earthquake even of less magnitude than the predicted Cascadia earthquake. The Crossroads intersection does not have safe sidewalks and bike lanes that would allow people to walk and bike to the Barbur Transit Center and other services within the Town Center, and the Barbur Concept Plan recommended addressing the deficiencies that are preventing the Crossroads from achieving its potential as a Town Center. The Initial Route Proposal does not include improvements on SW Barbur or SW Capitol Highway within the Crossroads station area that would accomplish that long term goal.

Alignment B1 offers a full minute less travel time (Table 5.2-2), better supports the Barbur Concept Plan and redevelopment within the Crossroads, and would create a safe overcrossing for motor vehicles, light rail and people in the event of an earthquake and weather-related conditions. Please reconsider the Initial Route Proposal and adopt Alignment B1 as the Locally Preferred Alternative.

Crestwood does not support Refinement 2, Taylors Ferry Road due to the following concerns. If Refinement 2 is selected in Metro’s SWC Locally Preferred Alternative (LPA), Crestwood insists on having in-depth discussion of these concerns with our residents and businesses during the next phase of the project.

Traffic: Traffic congestion in our neighborhood in the vicinity of SW Taylors Ferry Road and SW Capitol Highway and at the I-5 ramps is really bad during commute hours and when Portland Community College’s Sylvania campus is in session, and it is unsafe to walk or bike through this area today. The proposed at-grade crossing through the SW Taylors Ferry and SW Capitol Highway intersection will make traffic and safety conditions worse. The traffic analysis in Chapter 3 studied only one intersection (Taylors Ferry at the I-5 off-ramp) and not all seven intersections as noted above. The Taylors Ferry Road Vision Plan adopted by Portland City Council in 2004 recommends removal of I-5 exit ramp and numerous changes to this area, as does the 2015 ODOT Barbur Road Safety Audit. The proposed mitigations—a traffic signal, a motor vehicle “storage lane” and a marked crosswalk—are not sufficient to alleviate our traffic congestion and safety concerns. The DEIS must also consider the current effort to implement Congestion Pricing on I-5 between SW Multnomah Blvd and downtown Portland and the additional motor vehicle traffic this will add to SW Taylors Ferry Road, SW Capitol Highway, SW Barbur Blvd. and other roadways in our neighborhood.

ODOT jughandle project: ODOT has funded but not provided detailed information to Crestwood on their proposal to eliminate the left turn from northbound SW Capitol Highway to I-5 southbound other than the 2015 Barbur Road Safety Audit description (Page E-6, key assumptions). Crestwood objects to this “jughandle” proposal because it will add more motor vehicle traffic to many neighborhood roadways at multiple intersections without adding needed safety improvements for all people traveling through the Crossroads. Crestwood recommends a much simpler solution to ODOT’s safety concerns at SW Barbur and SW Capitol Highway: add a left-turn signal where northbound SW Capitol Highway enters the I-5 southbound ramp.

Safe Walking and Biking Needs: There is a narrow path next to the eastbound travel lane on SW Taylors Ferry Road that was constructed as a bike path in the 1980s. This narrow path is constrained where it crosses Woods Creek and terrifying for pedestrians and bicyclists trying to access the transit service and facilities in West Portland Crossroads. SW Taylors Ferry Road needs to be transformed into safer access between our neighborhood and the Barbur Transit Center. Project SA16, Taylors Ferry Sidewalks and Bikeway, must be constructed concurrently with the light rail project to allow people to safely walk and bike through this intersection. Refinement 2 includes additional “storage lanes” and retaining walls and sound walls that will make it more complex and expensive to add pedestrian and bicycle facilities in the future. If Refinement 2 moves forward, Project SA16 must be included as part of the SW Corridor Project Plan and not an optional project that would be assumed to be constructed some time between now and 2035. If Refinement 2 moves forward, the light rail structure over I-5 must also include bicycle and pedestrian facilities that allow people to cross I-5 more safely than the current conditions on SW Capitol at Barbur.

Property Displacement Impacts: Crestwood is extremely concerned about the loss of residential housing in our neighborhood so close to the West Portland Town Center. Crestwood is also concerned about negative impacts to Barbur World Foods, a popular grocery destination for many residents and key to the town center’s success. The DEIS does not discuss how the alignment would affect access to Barbur World Foods and Walgreens. The DEIS Appendix F does not differentiate whether properties would be partially or fully impacted by the proposal and the Refinement maps don’t illustrate the detail of the proposal, making a lot of people very concerned about whether and how this refinement affects their home and livability in our neighborhood. A number of our residents are alarmed about the loss of property value and livability from a light rail alignment running through our neighborhood.

Noise and vibration, sunlight, trees and livability: Crestwood is concerned about the noise and vibration impacts described in the draft Initial Route Proposal. The proposed light rail structure might be located above existing homes. While sound walls might mitigate against noise and vibration impacts, Crestwood is very concerned about the massive visual impact of the light rail structure and walls, and loss of sunlight and trees in our neighborhood, and livability. The proposed sound walls (and

needed retaining walls as well as the train tracks and motor vehicle mitigations) may make it impossible to construct needed pedestrian and bicycle facilities on SW Taylors Ferry Road in the future.

Station Access Over I-5: Crestwood has advocated for over 20 years for a pedestrian/bicycle overpass over I-5 in the vicinity of Markham Elementary School to make the neighborhood more accessible to schools, shops and services as well as the proposed LRT stop at SW 53rd and Barbur. Projects SA19 and SA20 are essential Station Access Projects for our neighborhood. These are also Safe Routes to Schools and other services in our neighborhood. At a minimum, if Refinement 2 and/or Refinement 4 are pursued then each of the LRT I-5 overcrossings must include facilities for pedestrians and bicyclists.

Environmental Concerns: The proposed location of the Taylors Ferry alignment is at the headwaters of Woods Creek. Crestwood is concerned about existing stormwater issues within the nearby neighborhoods and water quality impacts that would be exacerbated by this proposal. Woods Creek and Woods Park are not discussed in Chapter 4 and only briefly mentioned in Refinement 2. The impacts on the Woods Creek watershed and Woods Memorial Park must be addressed in the SW Corridor Plan.

Park and Rides: The IRP proposes to add as many as 2200 parking spaces at the three park and rides in the vicinity of Crestwood (825 at Barbur Transit Center, 950 at SW 53rd and 425 at SW 68th). This additional motor vehicle traffic driving through our neighborhood to access the park and rides will compromise livability and safety in our neighborhood. Station Access Projects such as SA16 and SA22 need to be constructed at the same time as light rail construction to make it safer to travel through our neighborhood by foot, bike, car or transit. The motor vehicle analyses and mitigations in Chapter 3 only discuss intersections directly at the entrance to the park and rides and must address the safety on the roadways that access the park and rides.

Bus Transit Service: The DEIS does not discuss what would happen to bus #43 which travels along SW Taylors Ferry Road. Over the last 20 years TriMet has cut service to the #43 and eliminated direct service to the Barbur Transit Center which resulted in lower transit ridership and increased motor vehicle traffic accessing the park and ride. Crestwood recommends that the SW Corridor Plan enhance transit service along SW Taylors Ferry Road and directly connect #43 with the Barbur Transit Center station and add weekend transit service. This is especially important because TriMet's Service Enhancement Plan calls for bus #43 to cross the Sellwood Bridge to connect with the Orange Line rather than traveling to downtown Portland, making it essential that #43 riders directly connect with transit service to downtown Portland and Tigard at the Barbur Transit Center station.

Crestwood Supports Refinement 4, Barbur Undercrossing, with some concerns.

The proposed SW 68th station in Refinement 4 would improve access to SWC light rail for the western portion of Crestwood, as noted on page E-13, but the undercrossing makes no sense and the maps do not illustrate how this will work. As described above, Crestwood believes Alternative B1 (Center Barbur) provides a more direct route and faster travel times than Alternative B2. Alternative B1 should continue the alignment along Center Barbur from the vicinity of the Barbur Transit Center to the station at SW 68th and NOT tunnel under Barbur. Refinement 4 must also include bicycle and pedestrian facilities to infill the many gaps in the pedestrian and bicycle network on 99W to access the station near SW 68th.

The Barbur Undercrossing as proposed may negatively impact the low-income housing at Ash Creek Commons and other residents nearby through vibration and noise; Ash Creek Commons residents are already subject to toxic exhaust fumes from the I-5 off-ramp that would be worsened by added congestion on 99W. Table 3.2-5 indicates that the intersection of Barbur, SW 64th and the southbound I-5 off ramp does not meet mobility targets and mitigations must be included in the SWC plan.

In summary, Crestwood neighborhood Association supports the concept of Light Rail Transit on Barbur but does not support some of the cost-cutting refinements that lack long-term vision for our region.

The existing bridges at SW Barbur/SW Capitol Highway Crossroads and the Barbur I-5 Overcrossing between SW 60th and SW 64th were substandard when they were built in 1959 and 1985, respectively, lack safe pedestrian and bicycle facilities and are highly likely to be destroyed in an earthquake less severe than the predicted Cascadia earthquake. The Initial Route Proposal lacks the vision to support projected growth in our region by avoiding needed pedestrian and bicycle improvements to access transit. The proposed refinements 2 and 4, if they are selected for further study, must include pedestrian and bicycle facilities on the light rail structures to enable people to walk and bike safely to the light rail stations and other services in our neighborhood.

Please support Alternative B1, Center Barbur, reject Refinement 2 Taylors Ferry, and amend Refinement 4 Barbur Undercrossing to design the SW Corridor project in a way that anticipates long-term growth in our region and safety of everyone who travels through our neighborhoods.

Sincerely,

/s/

Tony Hansen, President
Crestwood Neighborhood Association

SW Corridor Steering Committee
Crestwood Neighborhood Association Comments
SW Corridor Plan DEIS
Page 6

Cc: Marianne Fitzgerald, Vice President, Crestwood Neighborhood Association

O06: DoCoMoMo Oregon

Email:

From: [Iain MacKenzie](#)
To: [swcorridordeis](#)
Subject: SW Corridor DEIS comments
Date: Monday, July 30, 2018 11:50:39 PM
Attachments: [sw_corridor_DEIS_docomomo_comments.pdf](#)

Please find attached comments on the SW Corridor DEIS from Docomomo Oregon

Attachment:



DoCoMoMo U.S./Oregon Chapter
Portland, OR
www.docomomo-us.org/oregon

Southwest Corridor
600 NE Grand Ave
Portland, OR
97232

July 30th, 2018

Comments on SW Corridor DEIS re: Ahavath Achim

Dococomo Oregon understands that TriMet recently purchased Congregation Ahavath Achim synagogue at 3225 SW Barbur Blvd as part of the Southwest Corridor Light Rail Project, and that the site may needed for the construction of the Marquam Hill Connection. We urge you choose an option for this connection that limits any adverse impact on the historic building.

In 1962 the South Auditorium urban renewal project forced Congregation Ahavath Achim to move from South Portland. They attempted to relocate their their Moorish-inspired synagogue to SW Barbur Blvd, however the building did not survive the move. From 1965 to 1966 they constructed a new synagogue on the site that was set to be the home of their old building.

The distinctive modernist building was designed by noted Oregon architect John Storrs. When the City of Portland conducted its Historic Resources Inventory in 1984, less than 20 years after the building was completed, it was classified as a Rank II resource, indicating that it was potentially eligible for inclusion on the National Register of Historic Places. Now that the building is over 50 years old its historic significance has only grown. The building could be included on the National Register for its design, as well as for its association with the history of urban renewal and the Jewish community in Portland.

Given the history of the building it would be incredibly unfortunate if government actions resulted in the destruction of the synagogue for a second time. Dococomo Oregon opposes any option for Marquam Hill Connection that would require the demolition of the building, as we understand may be the case with Connection 2 (Full Tunnel). Options that do not require the demolition of the synagogue should still carefully consider what impact they will have on the building and its setting.

Thank you for your consideration.

Signed,

Iain MacKenzie, DoCoMoMo U.S./Oregon Chapter Vice President

About DoCoMoMo:

DoCoMoMo stands for the *DO*ocumentation and *CO*nservation of buildings, sites and neighborhoods of the *MO*dern *MO*vement. DoCoMoMo U.S./Oregon Chapter is a regional chapter of an international organization called DoCoMoMo International, which promotes the study, interpretation and protection of the architecture, landscape and urban design of the Modern Movement.

O07: Friends of Terwilliger

Text submitted using online comment form:

See attached comments.

Attachment:



Metro
Southwest Corridor DEIS
600 NE Grand Ave., Portland, OR 97232

July 19, 2018

RE: Southwest Corridor Plan DEIS & Initial Route Proposal Comments

The early elimination of the LRT route that would have tunneled under Marquam Hill and provided a station at OHSU was premature. The current justification for a "Marquam Hill Connection" between Barbur Blvd. and OHSU – that Marquam Hill is a critical destination with 10,000 potential daily riders – was downplayed at the time. Now this justification is being used to push another connector across Terwilliger Parkway that will greatly alter the character and quality of this historic and much-used linear city park. We don't agree with the planners and politicians who have decided that it's worth sacrificing a portion of Terwilliger Parkway in order to avoid the potential (and poorly studied) costs and complications of the Marquam Hill LRT Tunnel option. Friends of Terwilliger would like to support light rail to Marquam Hill in order to reduce traffic in the parkway and neighborhood, but the elimination of the underground OHSU station option leaves us with no acceptable alternatives.

Regarding the initial route proposal:

The description of the Marquam Hill Connection in the Project Introduction on page 1-4 states: *"The connection between the medical complex on Marquam Hill and SW Barbur Boulevard is critical for the project. Approximately 10,000 daily MAX line transit riders are expected with this improved access to the main campus of OHSU and the Veterans Affairs (VA) Portland Health Care System and Shriners hospitals."* This clearly shows the need for a LRT connection to Marquam Hill, especially given that it comprises 22% of projected daily ridership. But, according to Appendix I, the Marquam Hill Tunnel options were removed *"due to the relatively small travel time and ridership gains compared to the high capital cost of the tunnel, the substantial construction impacts at portals and station areas, and the high engineering risk"* and that *"Instead, a pedestrian and bike connection to Marquam Hill from the nearby surface HCT station on Barbur or Naito will be part of the project."* How can a 22% increase in ridership be a

"relatively small ridership gain"? The capital costs and construction impacts are not quantified in any detail and have not been adequately studied. It appears that it was easier to sacrifice a portion of the historic and environmentally significant Terwilliger Parkway rather than undertake that study.

According to the discussion of Section 4(f) Resources in Appendix D, the impacts to Terwilliger Parkway of all the Marquam Hill Connection options are significant: *"The impacts to Terwilliger Parkway from the vegetation removal and ground disturbance will be long lasting and will result in a severe visual change to this park. These impacts cannot be mitigated down to de minimis, and the Marquam Hill connection is therefore assumed to be a permanent use regardless of the option selected."* In spite of this evaluation, the Connection options have moved forward and no alternatives that don't significantly impact the parkway have been adequately studied. As the record will show, Friends of Terwilliger testified or provided comment on several occasions and implored project staff and leaders to find a LRT connection that does no harm to Terwilliger Parkway, but it appears we have been ignored.

DEIS Comments RE: Marquam Hill Connection:

All four Marquam Hill Connection options have significant and unacceptable impacts on Terwilliger Parkway in the vicinity of Campus Drive. *It is important to point out that the bulk of the infrastructure and impacts of the Connection will be on public park property (not on OHSU property or city right-of-way) and that this park property will be acquired from Portland Parks and Recreation and taken out of park use.* Options 1A, 1B, and 1C will all place an elevator tower and bridge in what is now a scenic canyon east of Terwilliger Blvd. that is full of Oregon white oaks, douglas firs, and other mostly native trees, many of which will be removed. They will also require the removal of native trees and plantings on the west side of Terwilliger and replace them with ramps, steps, retaining walls, and other construction that will destroy what few park-like qualities that remain in that area. These west side trees were planted in the 1990s to screen new OHSU buildings in accordance with the Terwilliger Parkway Corridor Plan which calls for a "forest corridor" in this location and they are only just now reaching a size where they can actually screen OHSU buildings from view. Connection Option 2 – a pedestrian tunnel – seems preferable because it connects people most directly from Barbur to OHSU and would have no physical presence at Terwilliger, but the proposed cut-and-cover construction method would remove even more trees than the other options; it would also leave a significant section of parkway hillside denuded and would expose an extensive conglomeration of OHSU buildings to direct view from Terwilliger Blvd. and pathway. Promising to re-plant trees is a hollow promise in that it will take several decades – under ideal conditions – to mature enough to screen buildings from view and recreate the forest corridor called for in the Terwilliger Parkway Plan. Other trees planted at Terwilliger and Campus Dr. in the last couple decades have not grown in as expected because of later OHSU construction projects requiring their removal, or because they were not planted in proper conditions and they

ended up dying. So if history is any indication, we should keep the trees we have and not remove them.

The Terwilliger Parkway Corridor Plan (TPCP), adopted by Portland City Council ordinance no. 155241 in 1983, is the governing planning document for the area proposed for the Marquam Hill Connection. Some of its goals relevant to this project are:

Goal A. *"To preserve and enhance the scenic character and natural beauty of Terwilliger Parkway and Boulevard."*

Goal B. *"To maintain and enhance unobstructed views from Terwilliger Boulevard and Trail"*

Goal D. *"To guide the siting, scale, landscaping, traffic impacts and design of new development to enhance the aesthetic experience of Terwilliger."*

Goal E. *"To manage the location and design of new vehicular and pedestrian access to Terwilliger in order to reduce traffic hazards and incompatible visual impacts."*

All four of the connection options violate one or more of these goals and, as stated in the 4(f) evaluation, will have *"long lasting impacts"* that *"will result in severe visual change"* and that *"cannot be mitigated"*.

TPCP Land Use Policy C. states: *"Allowable uses within the Terwilliger Parkway and Boulevard shall be limited to recreational uses such as walking, bicycling, jogging and picnicking, and other forms of passive recreation; supportive development such as restrooms; and viewpoint parking..."* The proposed connection is clearly not a recreational use.

Landscape Policy A. of the TPCP states: *"Develop, through plantings and improved maintenance, the Landscape Concept shown on Map 1 and illustrated in Figures 3 through 10..."* Map 1 shows a "Forest Corridor" for the west side of Terwilliger Parkway around Campus Drive where the connection is proposed. Figure 3 defines a Forest Corridor as *"A continuous, visually uninterrupted segment of the roadway which is heavily enclosed by native forest plantings and hillsides. Development is completely screened from view."* Yet the DEIS states on page 4-77: *"With the connection options, developed infrastructure would displace the mature vegetation. However, because the OHSU campus is directly uphill of Terwilliger Parkway here and is the dominant feature experienced by parkway users in this location, the change to the setting would be localized and reduced by the existing presence of large buildings and transportation infrastructure."* This statement contradicts both the aforementioned Goals of the TPCP and the Landscape Policy. The fact that OHSU campus buildings are dominant in this location is because of negligence and oversight. Trees were required to be planted to screen OHSU buildings as mitigation for tree removal and use of the parkway during construction of the aerial tram (see Land Use Review #05-122007 EN.) The trees subsequently died because the rock construction access road where they were planted was not removed. If those trees had been planted in favorable conditions and had survived they would be starting to screen

the buildings as required in the TPCP and OHSU buildings would not be the “dominant feature”. Justifying a new harm on the basis of an old harm should not be a valid argument. Also on page 4-77 it states that the removal of trees and shrubs “*would be negligible, because many acres of forested parkway would remain unchanged and largely inaccessible for public use, similar to existing conditions.*” This statement does not make any sense that we can discern and should be omitted.

Map 1 of the TPCP also shows a “Major View” to the east over the connection project area. While that view is currently partially obstructed by trees, many of those trees are deciduous and the view improves in the winter. The placement of an elevator tower and connecting bridge in the view shed would need to be sensitively handled to not block or mar the view, especially given that the project will open up this view by removing trees. There is little information in the DEIS that indicates how connector options 1A, 1B, and 1C will impact this view.

Landscape Policy B. of the TPCP states: “*Re-landscape the major entrances and focal points of Terwilliger Boulevard (including ...Campus Drive...) using, where possible, larger plant materials and ground-cover.*” This was undertaken in the 1990s as mitigation for construction of the Casey Eye Institute and the Doernbecher Children’s Hospital, but much of those plantings were removed during construction of the Kohler Pavilion and aerial tram and not properly re-planted. The few trees that have survived would likely be removed under all four connection options. Much of the planting area would be displaced by transportation infrastructure and there would be little room for planting larger plant materials and ground cover.

Why is there no mention of the historic importance of Terwilliger Parkway? The DEIS says that “*Terwilliger Parkway is recommended as eligible for listing on the NRHP*” but there is no mention of its “Historic Characteristics and Significant” in Table D-1 or elsewhere. Terwilliger Parkway holds an important position in the history of park development in Portland. It was conceived and partially designed between 1903 and 1912 by the most famous and sought-after landscape architecture firm of the time, Olmsted Brothers Landscape Architects, who were sons of the illustrious Frederick Law Olmsted. The elder Olmsted designed Central Park in NYC and many parks throughout America, the US Capitol grounds, Stanford University grounds, the Biltmore Estate, Riverside, Illinois, and the 1893 Chicago Worlds Fair grounds, to name just a few. He is a colossal figure in American Landscape Design and his sons continued his illustrious practice throughout the USA. John C. Olmsted came to Portland in 1903 to design the 1905 Lewis and Clark Exposition grounds and a master plan for Portland parks. Of the numerous parkways that they recommended to the Portland Park Board, only Terwilliger Parkway was actually constructed. This history and its connection to broad national currents make it the most historically significant park property in the entire DEIS study area, yet it gets virtually no mention. Additionally, Table 4.6-1 should show all four connection options as having “Full: Presumed Adverse Effect” due to acquisitions and easements.

Additional Miscellaneous DEIS Comments:

RE: Table 4.2-3 Segment A: Summary of Local Plan Compatibility: There is no mention of the Terwilliger Parkway Corridor Plan, Terwilliger Parkway Design Guidelines, or the Marquam Hill Plan. These plans are relevant and should be included.

RE: Table 4.4-2 Long Term Community Impacts: Segment A: The table ignores or understates the impacts of the connection options on Neighborhood Cohesion, Neighborhood Quality of Life, and Community Facilities. The Homestead Neighborhood, where the project area is located, considers Terwilliger Parkway to be an important asset to the neighborhood. The Homestead Neighborhood Association regularly expresses support for the maintaining the “Character of Terwilliger”. A recent survey by Friends of Terwilliger on a Saturday morning of pedestrians and runners found users from throughout the city, but the greatest numbers were from the surrounding neighborhoods. Many residents walk or run or bike on Terwilliger daily without the need to get in a car. Terwilliger Parkway offers a cool, forested respite from urban intrusions, but the Marquam Hill connection options will all bifurcate the parkway with tree removal and an intrusion of urban infrastructure. Terwilliger Parkway is an especially valued resource to citizens from throughout the city during hot summer weather because it can be 5 or 10 degrees cooler than the city at large due to its east-facing aspect and the cooling effect of the forest canopy. Removing more of that tree canopy, especially on the west side, would affect the value of Terwilliger as a destination for runners, walkers, and bikers.

Finally, it’s important to note that a “parkway” is a linear park (often with a road or pathway running through it) rather than a well-landscaped highway (as is often thought.) One of the prime characteristics of a linear park is its continuity. Terwilliger’s continuity is characterized by its well-designed grades and curves, its minimal infrastructure of roadway, pathway, and light poles, and by its natural setting that alternates between forest corridors and scenic viewpoints. Any Marquam Hill Connection option that interrupts the park continuity with urban infrastructure or that exposes more OHSU buildings to view degrades this valuable and historic city resource.

Sincerely,

Anton Vetterlein
President, Friends of Terwilliger
430 SW Hamilton St.
Portland, Oregon, 97239

1 I will get to be a user, but I am sure that my
2 grandchildren will.

3 And because they live in this area and
4 they have to commute every day to college and also
5 my daughter who goes and parks her vehicle over
6 there in the parking lots for commuting and she goes
7 to work this way. This will save a great amount of
8 time. And again, this is great improvement and
9 thank you so much for being here.

10 **MR. ONG:** Saalim Saalim.

11 **MR. SAALIM:** Hi, my name is Saalim Saalim.
12 I live in southwest Portland. I represent the HAKI
13 Community Organization and CAT, Community Alliance
14 of Tenants.

15 Many of our families live in Tigard.
16 We're so happy for the light rail line, I might also
17 move to Tigard. Yeah. So many has already been
18 said but I want to support the Ash modified option.
19 And yeah, this will make the housing rent go high,
20 but the most important thing here, please keep
21 resident housing -- houses rent fair and low into
22 whatever you guys do.

23 But please keep resident housing rent as
24 low as possible and fair. Make it low. Yeah. I
25 think that would be it, because many of everything

1 has already been mentioned, yeah. So that will be
2 it. Thank you.

3 (Whereupon, Spanish translation given.)

4 MR. ONG: And last is it Tiffanie?
5 Tiffanie Jeffreys.

6 MS. JEFFREYS: So I'm Tiffanie. I'm from
7 Tualatin, and I just wrote down some concerns. I
8 would appreciate having less difficulty to find
9 answers to our questions, it be easily accessible
10 and understood by the entire community. I'm aware
11 this may be difficult but it would be much
12 appreciated by the community, whether they are
13 referred to one specific website or printed packets
14 made accessible to us during community events, or by
15 the mail, it would be appreciated.

16 I'm also concerned about the Trimet police
17 and environmental impact that will be occurring
18 during this massive project; the animals, air, water
19 and other pollutants and disruptions.

20 I'm asking for more consideration of the
21 community in these ways, and if we can be more
22 involved in the discussions of these concerns.
23 Thank you.

24 (Whereupon, Spanish translation given.)

25 MR. ONG: All right. Let's give ourselves

NAEGELI
DEPOSITION AND TRIAL



(800)528-3335
NAEGELIUSA.COM

009: Hillsdale Business and Professional Association

From: [Mike Roach](#)
To: [swcorridor/eis](#)
Subject: Hillsdale Business and Professional Association Motion and Comments
Date: Thursday, July 19, 2018 1:51:52 PM

To Whom It May Concern,

At our July 18th monthly meeting, we passed the following motion:

Maintaining the access between the Hillsdale Town Center and Barbur Blvd via SW Capitol Highway is very important to the commercial health of Hillsdale. HBPA supports "Design Refinement 1" which will provide continuous access by not requiring construction at the ramps between SW Barbur Blvd and SW Capitol Highway. This refinement provides new bridges with pedestrian and bicycle facilities connecting to SW Slavin Road and SW Barbur Blvd over the Vermont and Newbury (Iowa Street) gullies, and in addition, provides a two-lane bridge adjacent to the new bridges.

Were "Refinement 1" to be the chosen alternative, HBPA believes it would and could enthusiastically support the SW Corridor Project. Please note that HBPA appreciates the accommodation of allowing bus line 54 to use the light rail tracks where applicable to decrease travel times to downtown Portland from Hillsdale.

We wish planners the best of luck with the project. HBPA looks forward to playing a constructive role in shaping the final design and finished product.

Sincerely, Mike Roach, President of HBPA and co-owner of Paloma Clothing for 43 years

O10: Hillsdale Neighborhood Association

Text submitted using online comment form:

The below comments is made on behalf of the Hillsdale Neighborhood Association, of which I am the current President. If you email me, I can provide this document as a beautifully formatted PDF (it will look a lot better, trust me).

What are Hillsdale's values?

Simply put, it's complicated. They are as complex as those of any such community which is as diverse as Hillsdale strives to be. Hillsdale is a collection of multiple perspectives and opinions, including, among others, those of: mothers and fathers; doctors and mechanics; sons and daughters; students and entrepreneurs; retirees; Jews, Muslims, Christians, and members of other faiths or no faith at all; Republicans, Democrats, Libertarians, Independents; and other sociological components of society everywhere. Except for a few residents, we are neither 21st-century civil engineers nor modern city planners. In general, these are not our collective areas of expertise. What Hillsdale Neighborhood Association (HNA) Members and the Board do understand--as a result of our meetings, presentations, and general discourse--are the values expressed by many of our 8,000 residents. Our area of expertise, as a Neighborhood Association, is the character of our community, developed over decades by concerned citizens who constitute our civic institutions. Our interests are as wide as our population is intellectually diverse. Through discussion, the HNA has drawn out themes expressing our values and interests, ones especially relevant to the Southwest Corridor Project (SWC), the 12-mile construction and development project which will impact our 17-Southwest neighborhoods for current and future generations. The SWC will be physically built according to the standards of state-of-the-art scientific engineering and design criteria. But, it must reflect--at the conceptual level--the human values of those who will be most affected by its physical components. Below is a description of the values of Hillsdale residents as they have been expressed in our Neighborhood Association forum and in other public and private ways. We hope to see them reflected in the design and implementation of the SWC--not only in Hillsdale but throughout the entire corridor. In no weighted order, our values are:

Affordable Housing and Anti-Gentrification

Repeatedly, the City of Portland and other government entities have felt compelled to make budgetary considerations, and not public need and aesthetics, primary when deciding which of the competing designs will best suit the human and natural environment. It is no secret, for example, that the City, Hillsdale included, has a problem with establishing and maintaining truly affordable housing. The HNA supports collaborative government and private sector efforts to address this complex but not intractable matter. We want to see public works projects planned with affordable housing as an important objective, and minimize the negative impact of development for tenants whose reliance upon affordable housing is economically essential.

Also, when decisions cannot be avoided which will force the relocation of individuals on a long-term or permanent basis, the HNA wants to see the City make anti-gentrification efforts a proactive priority. Specifically, we want to see protocols in place which allow relocated residents to have the "first right of refusal" when it comes to moving back into the community once construction is finished. There exist examples of how such a goal can be met by both the public and the private sectors, and we, the HNA, stand ready to offer our assistance to achieve this worthwhile objective.

Livability and Beautiful Design

The residents of Hillsdale want to live in an aesthetically beautiful space. Murals, statuary art, trees, and green-spaces are important expressions of our community's personality and already on display in the center and at the periphery of Hillsdale. They make the difference between having to go somewhere, wanting to be there, and wanting to stay there. Designing spaces for this aesthetic appeal are important and necessary to community support of any project.

Pedestrian/Bike Connectivity and Vehicular Traffic Flow

Human-powered travel is our top priority in and around Hillsdale. In general, Hillsdale believes in a future which brings the built environment to "human scale" where the arrangement of roadways, railways, greenery, and buildings, all support the spontaneous movement of people outdoors individually and in groups. Historically, the major roadway on its eastern edge (Barbur Boulevard) has not received focused attention to bring it to scale, nor to improve its use by means any other than automobiles, trucks, and buses; thus in its current state, it departs from the principle of human scale.

Another priority is optimal vehicular traffic. Often design for public right-of-way drastically favors vehicles in terms of space and traffic-flow design. We want to optimize vehicular traffic, but more so we want to optimize safe and efficient passage for pedestrians and bicycles. When weighing decisions, our preference favors pedestrians and bicycles. With respect to vehicular traffic, our preference is continuous-flow intersections rather than signalized intersections. We would like design to incorporate continuous-flow models into human-power designed streets. As a note, this preference is said with safety and convenience in mind for human-powered traffic with aims to facilitate shorter trips in the neighborhood and to access mass transit. We believe that this must take precedent over automobile speeds.

Proactive Infrastructure Improvements

Residents of Hillsdale have repeatedly expressed concerns about the Cascadia Subduction Zone earthquake. We recognize that our viaducts and buildings are a low priority for the City when compared to bridges over the Willamette River for example, especially after an earthquake occurs. Since opportunities to improve our infrastructure are rare, we view the SWC Project as a chance to make needed seismic upgrades ahead of "The Big One" or even "The Lesser Ones".

Affirming Support of these Values Across the Corridor

We want to affirm these values across all aspects of the SWC and other future Tri-Met/PBOT/ODOT projects within Hillsdale and beyond. We recognize that each person benefits from living in a city which holds these values above the financial cost of a project. We stand in support of the residents of other neighborhoods who share our values.

Applying Hillsdale's Values to the SWC Project

Based on our common ideals, the HNA supports increased mass-transit projects including the SWC, assuming that each project conforms with our values. We recognize that there are practical cost burdens associated with any public-works project, but we want to make it clear that any project or proposal which addresses each of our values will be seen positively. Livability, anti-gentrification, connectivity, and proactive infrastructure improvements outweigh cost-saving measures which reduce the relevance of our values. Of course, we want to be fiscally responsible, but the HNA weighs the above Socially Responsible Values higher than fiscal concerns when pitted against one another.

With respect to the 12-mile SWC, there are two stretches that directly fall within our geographic boundary. Thus, we feel a special need to express our preferences relating to them.

Barbur Woods

The first stretch concerns the portion of the Vermont and Newbury gullies, which we lovingly refer to as the "Barbur Woods". We prefer the option which addresses our values of proactive infrastructure improvements and connectivity and traffic-flow preferences. We recognize that design study is in an early stage across all proposals, but to date we support the option to place the light rail line on Barbur itself, rather than building an alternate structure. Our intention is that this alignment will update or replace the existing viaducts bringing them up to current earthquake standards.

Also, where Barbur and Capitol Highway meet (currently at the "flyover"), we prefer a continuous flow interchange as opposed to a signalized one. This does not necessarily need to be the current flyover (closed until late August for repair of a hole) or a similar design. Optimizing vehicular traffic from the Hillsdale Town Center to-and-from Portland is critical. That said, we also prefer a decision which favors pedestrian and bicycle traffic over vehicular traffic. We want to ensure that human-powered traffic has easy flow from Hillsdale all the way to Barbur, especially to the light rail stations.

Barbur Boulevard

The second stretch of the SWC concerns the choice between an I-5 adjacent alignment and a Barbur alignment. The HNA prefers the light rail line on Barbur. In its current design, this alignment has the potential to address the following values: anti-gentrification, livability, and connectivity. It is our priority to preserve and promote truly affordable housing by minimizing residencies which will require relocation, as well as encouraging new high-density affordable housing along the corridor, especially near light rail stations. When removal is necessary, which we recognize will be the case, we prefer removing businesses as opposed to removing housing. Lastly, we would like to encourage METRO to explore options for local statutes to be written which go beyond the Uniform Relocation Act and which would allow relocated residents and businesses to have the "first right of refusal" when new construction is completed in the corridor. We want to minimize relocation, and show support for those who were relocated to be able to return.

In terms of livability and beautiful design, the Barbur alignment is preferred. The community recognizes in this is a rare opportunity to bring the Boulevard to human scale, and to dramatically increase its safety for pedestrians and cyclists. Design aspects we want to see include (but are not limited to): continuous sidewalks, continuous bike lanes, street trees (both maintaining what we have and adding new trees), adding green space, encouraging community-designed art, as well as going above and beyond the standards required by the Americans with Disabilities Act. We want to see Barbur become a revitalized community hub where people of all ages, physical abilities, and travel preferences feel safe and welcome as shoppers, employees, and travelers.

Pedestrian and bicycle connectivity from the Hillsdale interior is important. Placing the light rail on Barbur means that those wanting to use the light rail will not have to cross over a major arterial in order to utilize that service, especially since Barbur would not have benefited from the street improvements if it was not the chosen option. We strongly desire that two lanes of traffic remain available so that vehicular traffic is not impeded.

Conclusion

We want the focus of the light rail to be optimal for people rather than for vehicles. When corridors are designed for the people who live in the homes, work in its businesses, and shop in those businesses, it creates a strong sense of community that cannot be formed when designing a passageway for vehicles alone. We support the viaduct and Barbur alignments because we support pedestrian-designed communities and transit ways. In the event that these are not the final alignments, we expect that our values are expressed in whichever alignments are chosen. We support this from Naito to the Barbur Woods, from those woods to Barbur Crossing, and from there until the eventual terminus in Bridgeport Village. Recognizing that other communities and neighborhoods will have different goals and preferences, we want to support all project decisions which are congruent with Hillsdale's values. We recognize that our preferences have a higher price tag, but we believe that the additional cost is a promise to ourselves and future generations that METRO will promote: anti-gentrification efforts, livability and beautiful design, optimizing traffic with the pedestrian and cyclist in mind, and proactive mitigation of earthquake damages. We believe that it is a true sign of community to plant the seed so that another may enjoy the shade of the tree. We commit ourselves to the benefit of future generations.

Thank you for your efforts and time. Your sacrifice is not lost on the residents of Hillsdale. Thank you.

Best,
The Hillsdale Neighborhood Association

O11: Homestead Neighborhood Association



Southwest Corridor
600 NE Grand Avenue
Portland, OR 97232

At a meeting of the Homestead Neighborhood Association on July 3, 2018 a discussion of elements of the Draft Environmental Impact Statement for the Southwest Corridor Light Rail Project that most affected our neighborhood resulted in a vote of the neighbors in attendance to take positions as follows:

Homestead NA supports Alignment Alternative A1: Barbur since it provides the closest pedestrian connection to Marquam Hill and would most encourage transit ridership to the hill.

2. Homestead NA opposes Marquam Hill Connection 1A because it would require an at-grade crossing of Terwilliger Boulevard involving a traffic signal for a pedestrian crossing. We believe the visual and operational impacts of a traffic signal on Terwilliger would have an unacceptable and detrimental effect on the parkway experience. We support a below grade (separated) crossing of Terwilliger and look forward to working with the City to determine the best means for accommodating all users of Terwilliger Boulevard.

3. Homestead NA opposes Design Refinement 1: Barbur Woods East Side Running as presented because of the negative impact on traffic flow as the light rail crosses traffic lanes. The impact to northbound vehicle traffic on Barbur Boulevard would be significant causing long traffic queues, increased energy consumption, and degraded air quality. Specifically we are concerned that the back-ups caused by these at-grade crossings would divert more traffic onto local neighborhood streets.

Thank-you for the opportunity to comment. We hope that you give serious consideration to our neighborhood's concerns about the items noted above.

Sincerely,

Ed Fischer, President
Homestead Neighborhood Association

O12: Multnomah Neighborhood Association

This comment letter was submitted twice, once via the online comment form and once via email. These two submissions are consolidated under Comment ID O12. The comment form text, email and attachment are all provided below.

Text submitted using online comment form:

I submit the attached testimony on behalf of the Multnomah Neighborhood Association

Email:

From: [martie sucec](#)
To: [Southwest Corridor Plan](#)
Subject: Re: SW Corridor wants to hear from you
Date: Monday, July 30, 2018 11:15:12 AM
Attachments: DEIS Testimony for the MNA.docx

Hi, Eryn,

I'm not certain that the letter I attached on behalf of the MNA actually got submitted, so to be sure, I'm attaching it here.

Thank you again for your heroic arrangements to get Chris and Jeb to our meeting. They were gracious enough to stay for what turned out to be the whole meeting—they were very informative and helpful. I think everyone realized how daunting and massive the work is involved in advancing such a complex project.

Best, Martie
Chair, MNA

On Mon, Jun 18, 2018 at 4:12 PM, Southwest Corridor Plan
<swccorridorplan@oregonmetro.gov> wrote:

There are several upcoming opportunities to learn more about the initial route proposal and the Draft Environmental Impact Statement (DEIS).



- Information hour at the Hillsdale Library
Thursday June 21 – staff will be at the library with a copy of the DEIS between 4:30 and 6:30 p.m. to answer questions.
- Open house at Marquam Elementary School
Tuesday June 26 – visit anytime between 6 and 8:30 p.m. to learn about the light rail route options and comment.
Free childcare, snacks and a raffle for tickets to the Oregon zoo and other fun prizes!
No presentation planned; materials will be available for viewing.
<https://www.facebook.com/events/638457576489456/>
- More events are planned in July, including another open house (7/12) and public hearing (7/19) in Tigard. Find a complete list at www.swccorridorplan.org.

Eryn Deeming Kehe

Senior Communications Specialist

Metro

600 NE Grand Ave.
Portland, OR 97232-2736

503-797-1881

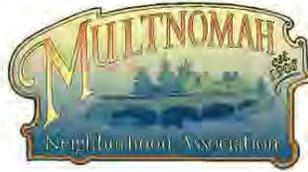
www.oregonmetro.gov

Metro | Making a great place

Stay in touch with news, stories and things to do.

www.oregonmetro.gov/connect

Attachment:



29 July 2018

To: The SW Corridor Light Rail Project Steering Committee
From: The Multnomah Neighborhood Association
Re: The Initial Route Proposal for the Light Rail in SW Portland

The Multnomah Neighborhood Association supports the purposes and goals of the SW Corridor Light Rail Project, and we strongly advocate for an LRT alignment down Barbur Boulevard (Alternative B1). Like other SW neighborhoods, especially those directly affected by the SWC project we want the intersection repaired at SW Barbur Blvd and SW Capitol Hwy—the Crossroads—Town Center repaired as has long and repeatedly been promised, since at least 1989. It's a disgrace that its repair and updating has been repeatedly delayed for one reason or another—and even more disgraceful that it is being neglected in the SWC LTP plan.

Since the SWC planners have opted to finance the Ross Island Bridge improvements outside the plan so that the South Portland Neighborhood and others switch support from the Naito alternative to the Barbur route, Metro and the City of Portland and others should also deal with and separately finance the SW Barbur Blvd and SW Capitol Hwy crossroads. After all, the two areas are both onramps to I-5 South and both are in dreadful disrepair.

Furthermore, the Crossroads area, specifically West Portland Park, has been designated a Town Center in the 2035 Comprehensive Plan—is the City serious about this designation? If so, the Crossroads cannot and should not be neglected in the SWC LRT plan.

Multnomah adamantly opposes the Taylor's Ferry Road alignment (Alternative B2, Refinement 2) and any alignment that encroaches on Woods Memorial Park and the adjacent environmental protection zones, including any flyover in these areas.

Aside from these objections, the traffic patterns at the multiple intersections of the Crossroads confluence have not been adequately analyzed and addressed. Multnomah also opposes Alternative B2 that would significantly encroach upon West Portland Park.

Alignment B1 is the logical route for the light rail, and if it is discarded because it will put the federal funding out of reach, then the Crossroads should be removed from the plan and funded separately, just as the Ross Island Bridge situation is being planned and funded separately, and the B1 alignment should go forward. It will be much more likely to recapture the support of SW neighborhoods.

Martie Sucec
Chair, Multnomah Neighborhood Association
SWNI/7688 SW Capitol Hwy/Portland OR 97219

O13: National University of Natural Medicine

Email:

From: [Marilynn Considine](#)
To: [Eryn Kehe](#)
Cc: [swcorridordejs](#)
Subject: DEIS & the Impacts to National University of Natural Medicine
Date: Wednesday, July 18, 2018 11:42:56 AM
Attachments: [FINAL_NUNM-letter-SW Corridor.pdf](#)

Hi Eryn,
Kindly share this with all appropriate stakeholders. If there's anything more we should do, please let me know. Dr. Schleich and I will be sharing our comments at the Tigard Town Hall meeting on Thursday, as well.

Thanks again for meeting with our team on Monday.
Marilynn

Marilynn S. Considine
Director, Public Relations & Communications
[REDACTED] | nunm.edu



[facebook](#) | [twitter](#) | [instagram](#)

Attachment:



July 18, 2018

Metro
Southwest Corridor Executive Steering Committee
600 NE Grand Avenue
Portland, OR 97232

Re: DEIS & the Impacts to National University of Natural Medicine

Dear Steering Committee Members:

For more than a decade, NUNM has worked with PBOT, Metro, TriMet and ODOT to resolve safety and access concerns caused by the heavy, fast-moving traffic that completely surrounds the footprint of our South Portland campus, particularly on Naito to our west, and the Ross Island Bridge to our east. City engineers have documented the steadily increasing traffic impacts affecting our university and our Lair Hill neighborhood. Due to the complexity of street configurations, no viable solutions previously have been formulated. Recently, though, the Southwest Corridor project and the release of the *Draft Environment Impact Statement (DEIS) Initial Route Proposal* present opportunities and potential answers.

NUNM has long supported the Naito Parkway alignment option for light rail. Today we want to build on our past and current collaboration with city and regional planners to provide context for our support of the DEIS recommendation for the Barbur Boulevard alignment. That support depends strongly on your approval to include the Ross Island Bridgehead project as a part of Metro's 2020 regional funding measures for the SW Corridor and regional transportation projects. The Bridgehead, if approved and funded, could not only finally fix the increasing congestion of commuter traffic build-up on Kelly and Water, but would generate sustainable traffic-calming effects and other benefits on Naito for the Lair Hill community, our campus, our students, our patients and our employees.

Improvements on Naito and the Bridgehead have been needed for many years and the Bridgehead reconfiguration offers a singular opportunity to fix longstanding traffic problems in our area. They address the safety issues that have long posed dangers to those accessing our campus. It will also finally knit the Lair Hill community together again, which has been sadly bifurcated since Naito was constructed in the '40s.

Impacts to the Future of NUNM

In this regard, it is important to the NUNM community and its many stakeholders in this neighborhood and all over our city and region that the Committee, the City of Portland and SW Corridor planners are aware of the critical impacts that the SW Corridor/Bridgehead Reconfiguration may impose on the promising, albeit vulnerable future of NUNM in South Portland. The potential disruption to our Master Plan and to current operations, most particularly to our campus clinic, the Lair Hill Health Center, are quite real given the possible acquisition of NUNM properties as outlined within the DEIS.

Indeed, the possibility has already begun to materially disrupt current and future campus planning, creating questions with donors and others about the future viability of NUNM's campus in South Portland.

OFFICE OF THE PRESIDENT

David Schleich, II | dschleich@nunm.edu | 503.552.1702 | 049 SW Porter Street | Portland, Oregon 97201 | nunm.edu

Specifically, due to the proposed acquisition of our clinic on Corbett and Water, and the potential acquisition of part of our large parking lot adjacent to our Academic Building abutting Naito, there would not only be serious interruption of ongoing and growing healthcare services to the 20,000 annual patient visits at our Lair Hill Health Center, but major impacts to medical training and certification of our student interns at the heart of our educational curricula.

It may be valuable for the Committee to know that our Lair Hill Health Center is one of two NUNM clinics recognized by the Oregon Health Authority as *Tier Four Patient-Centered Primary Care Homes (PCPCH)*, a designation attesting to NUNM's high quality standards, access to and continuity of care, accountability for patient outcomes, and coordination of treatments that are patient- and family-centered. The *PCPCH designation* is a badge we wear proudly as we work toward providing our patients Oregon's Triple Aim of better health, better care at lower cost.

Our clinic is intrinsic in the clinical skills education of our students. Here we produce and provide excellent primary care for our patients—many of whom are Medicaid recipients or are otherwise uninsured. The Lair Hill Health Center is an enduring and valuable conduit for NUNM's long-term relationships and partnerships with OHSU, Pacific University, more than a dozen community clinics, numerous FQHCs, and other essential educational organizations in the city. Our clinic and our Helfgott Research Institute, for example, have partnered for many years with OHSU in attracting millions of dollars in NIH-funded research grants supporting key studies of mutual medical interest.

Thus, while we recognize the viability of the recommendations under consideration for the SW Corridor in South Portland, we realize that long-term resolution of these important transportation, access and safety concerns for our city will require transformations that depend on careful management and communications with our stakeholders—not just current students, faculty, staff and patients, but also with prospective students, donors, campus partners and many others. NUNM plays a significant national leadership role in integrative and natural medicine, which reflects well on our City and its reputation for progressive-, people- and planet-centered design and rollout.

So, we need to rely on pragmatic, reliable and deliberate thought and planning by the SW Corridor engineers, and transportation and land use planners to “leave NUNM whole” in order to keep our campus in its current footprint at the base of the Ross Island Bridge. For without our Lair Hill Health Center, the coherence of our own campus planning and our future revenues are quite literally at risk. That these potential changes could force relocation of our entire campus enterprise—an option that would be formidable to the future of our institution and, we believe, a loss to the City of Portland, necessitates such care.

Thank you for your attention to our comments regarding the DEIS as it relates to the proposed Barbur alignment and the Ross Island Bridgehead Reconfiguration.

Sincerely Yours,



David J. Schleich, PhD
President
National University of Natural Medicine

OFFICE OF THE PRESIDENT

David Schleich, PhD | dschleich@nunm.edu | 503.552.1702 | 049 SW Porter Street | Portland, Oregon 97201 | nunm.edu

1 Committee. So I will read you off a couple at a
2 time who is going to come up first and then who will
3 be next as we go through this. And I have received
4 so far 31 cards of people who want to speak. So at
5 three minutes a piece, plus a little time for
6 transition, we're looking at a couple of hours, so
7 here we go.

8 The first up to speak is Dr. David
9 Schleich. And next up to speak, please come on up --
10 and the next to speak will be Ryan Sweeney.

11 **DR. SCHLEICH:** Thank you so much for the
12 opportunity to contribute to the DEIS comment
13 window. I represent as President of National
14 University of Natural Medicine and our stakeholders,
15 which include not only employees, who are faculty
16 and staff and support folks at the university, but
17 also, of course, our students and our patients.

18 The National University of Natural
19 Medicine is accredited by the regional accrediting
20 body of the Department of Education, and also, of
21 course, by the Higher Education Coordinating
22 Commission of the State of Oregon. We worked with
23 PBOT and Metro and ODOT for a dozen or years or so
24 to address safety and access issues caused by the
25 heavy and fast-moving traffic, which with we are all

1 familiar, that completely surrounds our campus
2 footprint, particularly Naito on our west side and
3 Ross Island Bridge to our east.

4 We support the Southwest Corridor Draft
5 Environmental Impact Statement and project, which if
6 approved and funded could finally remediate the
7 increasing congestion of commuter traffic build-up
8 on Kelly and Water, as well as provide traffic-
9 calming effects on Naito, all of which are directly
10 adjacent to our university property which is
11 evolving.

12 These proposed improvements to south
13 Portland have been needed for many years and the
14 proposal offers an opportunity to remedy those long-
15 standing difficulties. However, it's important that
16 we, for the record, indicate that the future of NUNM
17 in south Portland is affected by some of the
18 proposed changes. These property acquisitions, in
19 particular, that might be necessary for the bridge
20 gap really slam into our master plan, and
21 unfortunately create questions about the future
22 viability of the campus in south Portland.
23 Specifically, due to the proposed acquisition of our
24 clinic on Corbett and Water, and the potential
25 acquisition of a part of our larger parking lot

NAEGELI
DEPOSITION AND TRIAL



(800)528-3335
NAEGELIUSA.COM

1 adjacent to the academic building. There would be
2 disruption not only to healthcare services, of
3 course, which include 20,000 patient visits now a
4 year, but also impact the medical training of our
5 students.

6 So without our Lair Hill health center,
7 we'd be obliged in the interest of our students and
8 patients to -- in particular, to rethink our master
9 plan. So we intreat planners and decisionmakers to
10 work closely and earnestly with us to leave us whole
11 so that we can continue our mission in Portland and
12 beyond. Thank you very kindly.

13 COUNCILOR DIRKSEN: Thank you very much.
14 For the benefit of the court reporter, the Doctor's
15 last name is spelled S-C-H-L-E-I-C-H.

16 Thank you. Next, Ryan Sweeney followed by
17 Steve Watt.

18 MR. SWEENEY: Good evening, I'm Ryan
19 Sweeney. I'm co-owner of the Village Inn Restaurant
20 located at 17070 Southwest 72nd Avenue, on the
21 border of Tigard and Tualatin.

22 My family and I have owned that restaurant
23 since 1977. It was my first job when I was 10 years
24 old. I worked there throughout high school and
25 college, and when I graduated college, I became a

NAEGELI
DEPOSITION AND TRIAL



(800)528-3335
NAEGELIUSA.COM

O15: OPAL Environmental Justice Oregon

Email:

From: [Vivian Satterfield](#)
To: [swcorridordeis](#)
Subject: SW Corridor DEIS Comments Attached
Date: Tuesday, July 31, 2018 3:05:38 PM
Attachments: [Current Demographics Data.csv](#)
[EIS Comments.pdf](#)

Vivian Satterfield / [she her hers](#) / Deputy Director
OPAL Environmental Justice Oregon

www.opalpdx.org

Founded in 2006 by and for people of color and low income, OPAL Environmental Justice Oregon (OPAL) organizes our communities to achieve a safe and healthy environment where we live, work, learn, play, and pray. Environmental Justice (EJ) operates at the intersection of economic, racial and social justice. Our community-driven, multiracial movement challenges mainstream advocates and decision-makers to address systemic, historic causes of injustices in the built and natural environment: racism, settler colonialism, white supremacy and socioeconomic oppression. These factors leave a legacy of inequality in our neighborhoods and communities: polluted air, soil and water; unsafe, unaffordable housing; inequitable investments in housing, green spaces, active transit and mass transit we can access; disproportionate impacts due to climate change and inequitable climate action investments; and lack of action to prevent displacement in our communities. Decision-making on these policies often excludes historically marginalized peoples' meaningful involvement, perpetuating the inequality we experience.

I. THE DRAFT ENVIRONMENTAL IMPACT STATEMENT IS INADEQUATE.

The Draft Environmental Impact Statement ("EIS") for the Southwest Corridor Light Rail Project is inadequate and flawed. To fully comply with the National Environmental Policy Act ("NEPA") and the Civil Rights Act of 1964, we encourage Metro, TriMet and the Federal Transit Administration (collectively "Metro") to amend the EIS as specified in this document.

Any increased investment in transit in the Southwest Corridor has great potential to improve access to employment, education, and other opportunities. Community members with whom we have engaged consistently reference the need for transit access in the form of additional bus service and lines beyond the current proposed light rail alignment. Particularly given the demographics of the proposed alignment area - more diverse than the region more broadly - we want to ensure that low-income households and communities of color share in these benefits, through increased affordable housing, economic mobility, and community capacity. The Environmental justice compliance report (Appendix C) has old data and while the current numbers are estimates, several variables can still be compared to Census 2010. The usefulness of comparing 2010 to 2016 is that it will indicate the changes and shifts to the low income population. In addition to looking at number of people, it is also important to look at "average household size" and also poverty level by race, not just look at the percentage of low income as one single group. There are changes in where and how environmental justice populations are residing is already happening and so stated impact could be rather different. Current demographics data is attached to this comment for consideration.

Historic precedent from past transit projects (particularly the Yellow Line MAX) and our current affordable housing crisis make clear that, without community-led intervention, we cannot expect equitable outcomes. Stability and predictability for the two largest household costs - housing and transportation - are priorities for the communities directly impacted by this proposal. The Southwest Corridor Light Rail Project will indirectly cause population growth and gentrification—an impact not addressed by the Draft EIS. Over time, the region will look more appealing to property buyers and will result in reduced affordability,¹ resulting in the long-term displacement of low-income individuals and people of color. Metro has an obligation to properly address the lasting impact the project will have on environmental justice communities through additional mitigation measures. Moreover, the currently proposed mitigation measures are lacking and require supplementary detail into their effectiveness.

¹ See Draft EIS at 4-29.

The Draft EIS chose an arbitrary 0.5-mile buffer for its Environmental Justice analysis. Metro should clarify why a 0.5-mile radius was selected. Most importantly, the Draft EIS' failure to recognize and mitigate the project's disproportionate impact on low-income and minority communities may constitute a violation of Title VI of the Civil Rights Act of 1964. The Draft EIS must be amended as noted to comply with NEPA.

A. The Alternatives in the Draft EIS are Unreasonably Narrow and Preclude Consideration of Alternatives Which Would Not Displace Vulnerable Populations.

The alternatives in the Draft EIS focus solely on light rail transit. Light rail construction will result in gentrification and displacement of low-income individuals in the Southwest Corridor. We know the default outcome of inaction to address impacts of transit investments on non-subsidized, market-provided affordable housing is total displacement. In the case of the SW Corridor, we anticipate that residents in existing naturally-occurring affordable housing will face displacement out of Tigard and SW Portland, potentially out of the metro area entirely. We also know that these units of housing will become less affordable if they remain at all following the project. The potential for physical displacement of low-income households, and prime locations for stations are already increasing expectations of landlords and landowners for greater revenues from their properties, leading to economic displacement.

The chart below shows the average square footage of housing and the average rents along both the Yellow light rail line (Interstate MAX, opened May 4, 2004) and Orange (Milwaukie MAX, opened September 12, 2015) light rail line in the City of Portland compared to the Citywide Average during the same years:

Along the Yellow Line (excluding downtown)

Year	Inventory Stops	Inventory Units	Inventory Avg Sq Ft	Building Rent Per Unit
1970	323	2,010	603	\$1,275
2017	313	1,983	634	\$1,241
2018	309	1,926	610	\$1,240
2011	303	1,874	618	\$1,281
2004	290	1,588	548	\$1,288
2003	96	1,483	586	\$1,194
2002	92	1,257	645	\$1,086
2001	92	1,257	645	\$990
2000	91	1,292	649	\$857
2000	90	1,220	642	\$944
2008	88	1,147	587	\$997
2007	87	918	1,047	\$967
2006	85	847	1,047	\$861
2005	85	847	1,047	\$870
2004	85	847	1,047	\$796
2003	84	817	1,047	\$792
2002	84	913	1,047	\$889
2001	84	917	1,047	\$807
2000	84	977	1,047	\$764

Along the Orange Line (excluding downtown)

Year	Inventory Bldgs	Inventory Units	Inventory Avg SF	Asking Rent Per Unit
YTD	176	4,224	804	\$1,309
2017	175	4,220	804	\$1,267
2016	171	4,023	811	\$1,240
2015	168	3,948	815	\$1,197
2014	167	3,937	816	\$1,087
2013	164	3,807	823	\$1,029
2012	163	3,793	824	\$953
2011	162	3,781	824	\$922
2010	161	3,771	825	\$905
2009	161	3,771	825	\$875
2008	161	3,771	825	\$923
2007	161	3,771	825	\$892
2006	161	3,771	825	\$841
2005	161	3,771	825	\$806
2004	161	3,771	825	\$791
2003	161	3,771	825	\$793
2002	161	3,771	825	\$809
2001	161	3,771	825	\$799
2000	161	3,771	825	\$763

Citywide

Year	Inventory Bldgs	Inventory Units	Inventory Avg SF	Asking Rent Per Unit
YTD	3,066	74,967	781	\$1,381
2017	3,039	73,149	784	\$1,352
2016	3,003	70,846	787	\$1,347
2015	2,957	67,221	793	\$1,302
2014	2,920	64,309	797	\$1,302
2013	2,885	62,506	804	\$1,121
2012	2,857	61,088	809	\$1,039
2011	2,843	60,133	813	\$996
2010	2,838	60,088	813	\$975
2009	2,829	59,738	813	\$968
2008	2,803	57,183	812	\$1,004
2007	2,779	54,875	804	\$954
2006	2,770	54,464	804	\$849
2005	2,760	53,674	804	\$805
2004	2,746	52,674	803	\$787
2003	2,724	50,302	770	\$789
2002	2,713	49,910	770	\$793
2001	2,706	49,778	769	\$786
2000	2,694	49,598	768	\$753

Property speculation ahead of the light rail opening date and increased investments as a result of the light rail have contributed to the displacement of households unable to afford the increase in rents and the lack of a diversity of housing units in new construction.

SW Portland and Washington County tenants experience housing issues similar to those found in Multnomah County. In 2016, Community Alliance of Tenants (CAT) Hotline calls in the SW Corridor area² indicated that the greatest needs of tenants in the corridor are support for evictions related issues (no-cause and for-cause), repairs (i.e. environmental health concerns, mold, bedbugs), rising rents, retaliation, and fair housing issues. In 2013-14 CAT and Unite Oregon partnered to organize immigrant and refugee tenants in Washington County to illuminate tenant needs. Tenant organizing addresses immediate needs, building by building, while educating and organizing tenants to exercise their rights for community change. This effort builds the next step towards systemic change, addressing the organizational and information gaps that can leverage people power and the resources of local, regional, state, and federal dollars to build complete and livable communities without displacement.

Consequently, we request that Metro feature a wider range of alternatives to light rail that have less community impact, specifically increased bus operations and services.

1. Supplemental alternatives are congruent with the project’s Purpose and Need statement.

Broadening the alternatives analysis is consistent with the Purpose and Need of the project. An EIS must state the underlying purpose and need for the proposed action.³ The Purpose and Need statement cannot be so “unreasonably narrow” that only one alternative could accomplish the goals of the project.⁴ Although courts have upheld statements which call for a specific purpose, like expanding a light rail system, *broader* project objectives must be considered.⁵

Besides “provid[ing] light rail transit service,” the Draft EIS Purpose and Need statement includes providing travel options that promote community equity and advancing projects that are sensitive to the environment.⁶ The Purpose and Need statement importantly prioritizes cost-effectiveness, reliability, frequency, and efficient travel times.⁷ These objectives may be accomplished without light rail expansion by a Bus Rapid Transit (BRT) alternative and increased bus services. This alternative could fulfill the transit gap while preventing cumulative displacement.

The Draft EIS states that the Southwest Corridor’s transit demand is projected to increase 81 percent in the next 25 years,⁸ and it subsequently eliminates BRT as an alternative for “lack[ing] the long-term capacity to meet the corridor’s projected demand.”⁹ The Draft EIS does not describe in detail why this increase cannot be met by the BRT alternative. We request data and information on how Metro concluded that the 81 percent increase in transit-demand could not be met by BRT. Metro also alleges that the BRT alternative would have “higher long-term operating costs than light rail.”¹⁰ We request data demonstrating

² (zip codes 97239, 97219, 97233, 97224, 97062, 97140, Source: CAT Hotline Database)

³ 40 C.F.R. § 1502.13.

⁴ *Nat’l Parks & Conservation Ass’n v. Bureau of Land Mgmt.*, 606 F.3d 1058, 1070 (9th Cir. 2010); *see also Friends of Southeast’s Future v. Morrison*, 153 F.3d 1059, 1066-67 (9th Cir. 1998).

⁵ *Audubon Naturalist Society of the Central Atlantic States, Inc. v. U.S. Dept. of Transp.*, 524 F. Supp. 2d 642, 664 (D.Md. 2007); *see also Davis v. Latschar*, 83 F. Supp. 2d 1, 8 (D.D.C. 1998); *City of Alexandria v. Slater*, 198 F.3d 862, 867-68 (D.C. Cir. 1999).

⁶ Draft EIS at 8-3.

⁷ *Id.* at 1-5.

⁸ Draft EIS at 1-6.

⁹ Draft EIS at 2-3.

¹⁰ *Id.*

that the light rail project would cost less than BRT over time. Without any additional explanation in the DEIS on these points, the public has no way to understand how the agencies reached their conclusions.

Additionally, we demand consideration of multi-modal forms of transportation which do not focus solely on light rail construction. For example, a variety of transit options can include an increase in regular bus services in addition to BRT. As the Draft EIS stands, the elimination of BRT excludes an entire mode of alternative mass transit for the Southwest Corridor. Effectively, the elimination of BRT prior to the Draft EIS also eliminated public involvement in the decision-making process.

Operational services are viable alternatives to the light rail capital project. Proper alternatives to the light rail are not different routes to the same overarching project; rather, they are different modes of transportation which fulfill the proposal's underlying goals. In short, the Draft EIS' "Light Rail Alternatives" are not alternatives at all—they are different routes for the same project. Consequently, we request a multi-modal transit alternative that aligns with the project's Purpose and Need statement.

2. The current alternatives are insufficient and must be broadened to consider operational services.

The Final EIS must include supplementary alternatives, such as operational services, which achieve the project's underlying objectives while mitigating environmental impacts. NEPA requires Metro to rigorously explore alternatives to the proposed project.¹¹ The alternatives analysis is "the heart of the environmental impact statement."¹² An EIS is inadequate when it fails to examine a viable alternative.¹³ In this case, the Draft EIS is inadequate because it fails to consider viable projects that will fulfill the transit need while mitigating environmental impacts.

Although the EIS does not need to include alternatives of "speculative feasibility,"¹⁴ the proposed expansion of bus services and BRT is feasible and practical. The expansion of transit services on existing capital is a *clear alternative* to building new infrastructure and potentially displacing vulnerable communities. The Draft EIS states that a BRT alternative was eliminated from detailed study,¹⁵ but a more detailed analysis is warranted when long-term displacement of communities is a known risk.

The Final EIS must include a wider range of alternatives which allow for "informed decision-making and informed public participation."¹⁶ This broadened range should include a variety of transit services, including BRT. Based on OPAL's research, bus services may more effectively serve the transit-dependent community, contrary to the Draft EIS' determination that such a proposal lacks public support.¹⁷ Such an alternative would mitigate the project's potential of gentrification and long-term displacement of low-income individuals and people of color. In short, broadening the alternatives analysis would conform to the project's Purpose and Need statement and would also certify Metro's compliance with NEPA.

¹¹ 40 C.F.R. § 1502.14.

¹² *Id.*

¹³ *Morongo Band of Mission Indians v. FAA*, 161 F.3d 569, 575 (9th Cir. 1998); *Alaska Wilderness Recreation & Tourism v. Morrison*, 67 F.3d 723, 729 (9th Cir. 1995).

¹⁴ *Natural Resources Defense Council, Inc. v. Callaway*, 524 F.2d 79, 93 (2d Cir. 1975).

¹⁵ 40 C.F.R. § 1502.14.

¹⁶ *Wellands Water Dist. v. U.S. Dep't of Interior*, 376 F.3d 853, 972 (9th Cir. 2004) (quoting *California v. Block*, 690 F.2d 753, 767 (9th Cir. 1982)).

¹⁷ Draft EIS at 2-3.

B. The Draft EIS Fails to Address the Light Rail Project's Indirect and Cumulative Growth-Inducing Effect.

The EIS must consider the “direct, indirect, and cumulative effects” of the proposed action and alternatives.¹⁸ Metro must take a “hard look” at these environmental consequences to fulfill the requirements of NEPA.¹⁹ Metro has failed to address the indirect, cumulative effects of the project as it relates to long-term displacement and population growth.²⁰ The light rail project would increase the property value of surrounding areas and would result in displacement of more residential homes than are assessed currently. The Final EIS must feature analysis on the indirect and cumulative effects of gentrification and population growth, which would result from rising property values in Southwest Portland and Tigard.

An analysis of these indirect and cumulative effects is essential to prevent displacement of low-income residents in the Southwest Corridor. The impact of past projects indicates that the Draft EIS does not *seriously address* the indirect and cumulative effects of rising property prices on environmental justice communities, such as low-income people and people of color. For example, the construction of the MAX Yellow Line sped up the process of gentrification by making North Portland a more desirable living area for wealthy, white residents.²¹ Maxine Fitzpatrick, the Executive Director of a non-profit organization that attempts to preserve and manage affordable, high-quality housing, claims that “significant displacement of low-income families has occurred in the interstate urban renewal area since the start of Yellow Line service.”²²

Indirect effects the proposed action will cause are later in time or farther removed in distance *but are still reasonably foreseeable*.²³ They include growth-inducing effects.²⁴ Agencies have a duty to discuss growth and development that would result from a project. A prime example is *City of Davis v. Coleman*, where the United States Court of Appeals for the Ninth Circuit held that the Environmental Assessment of a highway interchange project had to discuss growth impacts.²⁵ Additionally, a cumulative impact is “the impact on the environment which results from the incremental impact of the action *when added to other past, present, and reasonably foreseeable future actions* regardless of what agency . . . or person undertakes such other actions.”²⁶ Cumulative impacts can result from “individually minor but collectively significant actions taking place over a period of time.”²⁷

¹⁸ 40 C.F.R. § 1508.25(c).

¹⁹ *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 350 (1989).

²⁰ Draft EIS at 4-153-4-158.

²¹ Mark Kirchmeier, *Waves of Displacement Began Washing Over Black Portlanders Long Ago*, Portland Tribune, June 6, 2017,

<https://portlandtribune.com/pt/9-news/361975-241172-waves-of-displacement-began-washing-over-black-portlander-s-long-ago>.

²² *Id.*

²³ 40 C.F.R. § 1508.8.

²⁴ *Id.*

²⁵ *City of Davis v. Coleman*, 521 F.2d 661 (9th Cir. 1975); *see also Laguna Greenbelt, Inc. v. U.S. Dept. of Transp.*, 42 F.3d 517 (9th Cir. 1994) (growth-inducing impact of a toll road); *Sierra Club v. Marsh*, 769 F.2d 868, 878 (1st Cir. 1985) (growth-inducing impact of building a port and causeway).

²⁶ 40 C.F.R. § 1508.7 (emphasis added).

²⁷ *Id.*

Executive Order 12898, also known as the Environmental Justice compliance, requires further analysis of these indirect, cumulative effects. Executive Order 12898 provides that “each [f]ederal agency shall ensure that all programs or activities receiving [f]ederal financial assistance that affect human health or the environment do not directly, or through contractual or other arrangements, use criteria, methods, or practices that discriminate on the basis of race, color, or national origin.”²⁸ Therefore, the Federal Transit Administration (“FTA”) may not intentionally discriminate on the basis of race, color, or national origin.

The FTA’s environmental justice policy guidance states that a “disproportionately high adverse effect” is one that is (1) predominately borne by a minority or low-income population; or (2) will be suffered by the minority and/or low-income population and is appreciably more severe or greater in magnitude than the adverse effect that will be suffered by the non-minority population and/or non-low-income population. A project that has a disproportionate effect may only be carried out “if further mitigation measures or alternatives that would reduce the disproportionately high and adverse effects *are not practicable*.”²⁹ In determining whether an alternative is “practicable,” the social, economic, and environmental effects are considered.³⁰

The Draft EIS states simply that displacement of residents may occur from reduced affordability: “[r]educed affordability of market-rate housing results from increases in property value and demand to live near light rail service.”³¹ The Draft EIS recognizes this impact (albeit briefly), and consequently, FTA is on notice that the Southwest Corridor Light Rail Project will displace vulnerable residents over time. The Southwest Corridor Equital Housing Strategy names that the actual need for affordable homes in the City of Portland impacted by the SW Corridor Light Rail is 2,660 homes (910 newly constructed and 1,650 acquired or converted). The need in Tigard is 1,580 homes (730 newly constructed, 850 acquired or converted). Median household income (\$73,000) and educational attainment (56 percent with a Bachelor’s degree) in the corridor is higher than that of the city of Portland. However, for some low-income households, housing costs are eating away at incomes. There are over 8,300 renters and 4,400 low-income homeowners who make less than 80% of the median family income (MFI). Over 70 percent of these households are paying more than 30 percent of their income on housing. Whites and Asians have approximately double the income of Black and Hispanic or Latino households.³²

The Draft EIS also claims that the project makes the area an “appealing location[] for legally binding affordability-restricted housing.”³³ It fails to further point out that the need for restricted-housing is a significant consequence of light rail itself. Current local jurisdictional policies alone cannot adequately address direct displacement as a result of the light rail construction. The City of Portland has no specific programming or targeted outreach to low-income renters, and while land-banking is identified as one approach to preventing displacement, policy on land banking with transit projects is still to be determined. To address indirect displacement, the only policy the City of Portland currently has is a deterrent; the City’s Mandatory Renter Relocation Assistance Policy places requirements on no-cause evictions (there are several exemptions, however which may be invoked by landlords such as a situation in which a unit is rendered uninhabitable).

²⁸ Exec. Order No. 12898, 59 Fed. Reg. 7629 (1994).

²⁹ *Id.* at 5.

³⁰ *Id.*

³¹ Draft EIS at 4-29.

³² Appendix 1, *SW Corridor Equity and Housing Needs Assessment*

³³ Draft EIS at 1-8.

The Draft EIS also states that “increased levels of activity” and population growth will occur “whether the light rail project is built or not.”³⁴ Generally, as new residents and businesses move in, market forces push property prices higher. It is inevitable that low-income individuals will be forced out of their communities to seek cheaper homes to rent or buy.³⁵ Though the region’s population is predicted to increase, it does not follow that the light rail project will not *contribute to or exacerbate* the pace of displacement. Metro must consider the cumulative effect of the proposed project with the impacts of past, present and reasonably-foreseeable actions. Thus, the Final EIS must articulate the cumulative effects of displacement and gentrification and must articulate what role the Southwest Corridor Light Rail Project would play in those impacts.

In this case, population growth and gentrification are indirect and cumulative consequences of the light rail project. Given the impact of past projects like the MAX Yellow Line, population growth is a reasonably foreseeable effect of the light rail project. The light rail would heighten the appeal of Southwest Portland, Tigard, and Tualatin to high-income individuals, thus creating an indirect but *foreseeable* environmental impact. Furthermore, although population growth will be minor on an individual scale, the collective undertaking is a significant environmental impact and is inherently growth-inducing. This constitutes a cumulative impact. Thus, the Draft EIS is currently inadequate because of these deficiencies. To comply with NEPA and Environmental Justice, the Final EIS must address the project’s indirect and cumulative growth-inducing effects on low-income and minority communities.

C. The Mitigation Measures Are Inadequate Because They Fail to Address Growth-Inducing Effects and Do Not Outline the Proposed Measures’ Effectiveness.

The Draft EIS’ mitigation measures fall short. NEPA requires that proposed mitigation measures provide more substantial detail and evaluate effectiveness. Additionally, new mitigation measures are required for the growth-inducing and gentrifying consequences of the project.

1. No mitigation measures were proposed for the long-term impact of population growth and gentrification.

Because the Draft EIS has failed to analyze core impacts of the light rail project, the mitigation measures are inadequate. The Draft EIS does not address mechanisms to prevent the growth-inducing consequences of the light rail project. An EIS must include mitigation measures for “any adverse environmental effects which cannot be avoided.”³⁶ Generally, “[a] mitigation discussion without at least some evaluation of effectiveness is useless in making that determination.”³⁷ Mitigation measures must be discussed in “sufficient detail to ensure that environmental consequences have been fully evaluated.”³⁸

The Final EIS must attempt to mitigate the displacement of communities in Southwest Portland, Tigard, and Tualatin as a result of the light rail project. This analysis should specifically address the impact of population growth and gentrification on low-income individuals and people of color in the

³⁴ Draft EIS at 4-153.

³⁵ See TriMet, *New Places to Live and Go Along the Yellow Line*, 10 Years of MAX Yellow Line, April–May 2014, http://news.trimet.org/wordpress/wp-content/uploads/2014/05/TRIMET-YellowLine_Combined_-sm.pdf.

³⁶ See 42 U.S.C. § 4332; 40 C.F.R. § 1508.20; *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332 (1989).

³⁷ *S. Fork Band Council of W. Shoshone of Nevada v. U.S. Dept. of Interior*, 588 F.3d 718, 727 (9th Cir. 2009).

³⁸ *Laguna Greenbelt, Inc.*, 42 F.3d at 528.

region. In addition, the Final EIS must address whether these mitigation measures will truly be effective in preventing long-term displacement of these vulnerable populations.

2. The proposed mitigation measures are insufficiently detailed and do not adequately consider effectiveness.

The currently proposed measures are inadequate because they are not sufficiently detailed and do not sufficiently consider effectiveness. “NEPA requires . . . that mitigation be discussed in sufficient detail to ensure that environmental consequences have been fully evaluated.”³⁹ Although NEPA’s mitigation requirements are not substantive, they are an integral part of the environmental review process.⁴⁰ Courts regularly require a discussion on mitigation effectiveness because it is “[a]n essential component of a reasonably complete mitigation discussion.”⁴¹ Agencies cannot simply list possible mitigation measures—they must address them in some detail.⁴²

In this case, Metro do not provide “sufficient detail” on their proposed mitigation measures. Instead, the Draft EIS lists potential measures without detail or evaluation of effectiveness. For example, under potential mitigation measures to impacts on neighborhoods and community facilities, the Draft EIS states:

TriMet, Metro, the City of Portland and the City of Tigard are coordinating to identify strategies to prevent the indirect economic displacement of residents living near the light rail alignment. These strategies could include banking land for future development of affordable housing, purchasing existing, naturally occurring affordable housing to preserve its affordability; and providing financial assistance to low-income residents.⁴³

Metro does not weigh the effectiveness of these considerations, nor does it explain what the mitigation measures of “banking land,” “purchasing existing . . . housing” or “providing financial assistance” would actually encompass.

The Final EIS must offer mitigation measures to the growth-inducing and gentrifying impacts of the light rail project and evaluate their chances of success. Additionally, Metro is legally obligated to expand on the current mitigation measures. The Final EIS must be sufficiently detailed and authentically assist the agency in decision-making. This can be achieved by further detailing each mitigation measure and genuinely considering their effectiveness.

D. The Final EIS Must Clarify Why a 0.5-Mile Radius Was Chosen for the Environmental Justice Analysis.

The Final EIS should explain its selection of a 0.5-mile radius for its Environmental Justice analysis. An EIS must “succinctly describe the environment of the area(s) to be affected.”⁴⁴ The choice of scale “must represent a reasoned decision and *cannot be arbitrary*.”⁴⁵ Although deference is granted to agencies to identify the relevant geographic area for analysis, courts have found standardized buffers to be arbitrary

³⁹ *Id.*

⁴⁰ *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 352 (1989).

⁴¹ *S. Fork Band Council of W. Shoshone of Nevada*, 588 F.3d at 727.

⁴² *See Neighbors of Cuddy Mountain v. U.S. Forest Service*, 137 F.3d 1372, 1380 (9th Cir. 1998); *Colo. Envtl. Coal. v. Dombeck*, 185 F.3d 1162, 1173 (10th Cir. 1999).

⁴³ Draft EIS at 4-40.

⁴⁴ 40 C.F.R. § 1502.15.

⁴⁵ *Idaho Sporting Cong., Inc. v. Rittenhouse*, 305 F.3d 957, 973 (9th Cir. 2002) (emphasis added).

and capricious.⁴⁶ For example, agencies may not “gerrymander” to exclude surrounding minority and low-income people by using a default radius.⁴⁷ The 0.5-mile radius must still be reasonable.⁴⁸

Currently, the Draft EIS selects a 0.5-mile radius for the Environmental Justice analysis but does not provide reasoning for its selection. This is concerning when low-income and minority communities are prevalent outside the radius.⁴⁹ We request an explanation of the selected distance, and why Metro believes there will not be environmental impacts, especially displacement of environmental justice communities, outside this 0.5-mile boundary. More specifically, why was a 0.5-mile buffer selected when the number arbitrarily cuts through a dense portion of low-income and minority residents?⁵⁰ A reasonable explanation for this numerical threshold must be provided to demonstrate that the buffer is not arbitrary. As it stands, the 0.5-mile buffer is unreasonable.

E. Metro’s Failure to Address the Light Rail’s Displacement of Minority Communities May Violate Title VI of the Civil Rights Act of 1964.

The Draft EIS’ obliviousness to displacement and gentrification of low-income and minority communities likely violates Title VI of the Civil Rights Act of 1964 and subsequent Environmental Justice guidance. The Final EIS must properly address these impacts and provide mitigation measures; otherwise, Metro may be liable for discrimination under Title VI.

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance.⁵¹ Although Title VI does not explicitly include a disparate impact provision,⁵² several agencies have regulations that prohibit practices that have the *effect* of discrimination based on race, color, or national origin.⁵³ The FTA is one such agency and is a contributor to the Southwest Corridor Light Rail Project. Consequently, Title VI requires that a facially neutral program, which has a discriminatory impact on minority populations, only be carried out if (1) the recipient can demonstrate a substantial legitimate justification for the program policy or activity; (2) there are not comparably effective alternative practices that would result in less disparate impacts; and (3) the justification for the program, policy or activity is not a pretext for discrimination.⁵⁴

In addition, the FTA’s Environmental Justice compliance pursuant to Presidential Executive Order 12898 requires the avoidance, minimization, and mitigation of disproportionately high and adverse impacts on minority and low-income populations.⁵⁵ The Department of Transportation is responsible for

⁴⁶ See, e.g., *Standing Rock Sioux Tribe v. U.S. Army Corps of Engineers*, 255 F. Supp. 3d 101, 137 (D.D.C. 2017) (holding that a 0.5-mile radius was arbitrary and capricious because it gerrymandered people of color).

⁴⁷ See *id.*

⁴⁸ See *id.* at 138.

⁴⁹ Draft EIS, Appendix C - Environmental Justice Compliance at C-9, C-11.

⁵⁰ See Draft EIS, Appendix C - Environmental Justice Compliance at C-9, C-11.

⁵¹ 42 U.S.C. § 2000d.

⁵² See, e.g., *Alexander v. Choate*, 469 U.S. 287, 293 (1985).

⁵³ See 42 U.S.C. at § 2000d-1 (agency authority to regulate Title VI further).

⁵⁴ U.S. DEP’T OF TRANSP., FEDERAL TRANSIT ADMINISTRATION, FTA C 4703.1, ENVIRONMENTAL JUSTICE POLICY GUIDANCE FOR FEDERAL TRANSIT ADMINISTRATION RECIPIENTS 4 (2012), [hereinafter *Environmental Justice*] https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_EJ_Circular_7.14-12_FINAL.pdf.

⁵⁵ *Id.* at 2.

Title VI and Environmental Justice compliance and *must ensure* that the Southwest Corridor Light Rail Project does not subsidize discriminatory practices.⁵⁶

Although the Draft EIS recognizes that Title VI and Presidential Executive Order 12898 are binding, Metro has failed to address the disproportionate impact the Southwest Corridor Light Rail Project will have on low-income and minority communities. In its current state, the Draft EIS ignores long-term, cumulative impacts on minority and low-income populations resulting from population growth and displacement.

The Draft EIS admits that the project will indirectly cause property prices to increase through redevelopment around stations, which in turn would impact low-income populations.⁵⁷ As a result, Metro is on notice that light rail construction, without legitimate mitigation, will discriminate against low-income individuals in the Southwest Corridor. Moreover, the FTA is held to a higher standard—requiring mitigation of disparate impact. The Southwest Corridor Light Rail Project may not proceed without measures to mitigate this disproportionate and discriminatory impact.⁵⁸

Both Title VI and Presidential Executive Order 12898 mandate that the FTA mitigate these disproportionate effects. Otherwise, the agency must demonstrate that mitigation is impracticable and that there are *no comparable alternatives* which would result in fewer disparate impacts. In this case, the BRT plan proposed herein is a comparable alternative. To comply with Title VI, the Final EIS must seriously address the project's gentrifying and growth-inducing impacts on low-income people and people of color; it must also mitigate the project's consequences and consider legitimate alternatives.

II. CONCLUSION

Overall, the Draft EIS is inadequate and must be amended as specified. The Final EIS should expand its alternatives analysis to consider less-intensive operational services. It must amend its proposed mitigation measures to be more detailed and delineate their effectiveness. The Final EIS also address the growth-inducing and gentrifying effect of the light rail project and subsequently suggest mitigation measures. Lastly, the Final EIS should expound upon its 0.5-mile radius selection. These modifications will alleviate the disproportionate and discriminatory impact the Southwest Corridor Light Rail Project would have on low-income people and people of color.

⁵⁶ *Id.* at 4.

⁵⁷ See Draft EIS at 8-20, 4-155–56, 5-7.

⁵⁸ *Id.* at 5.

1 accessible to those people. I have talked to my
2 neighbors and a lot of them are older demographic,
3 and they are completely unaware that the refinement
4 was going in at all. So I ask that you retract
5 refinement 4 from the proposed plan and thank you.

6 **COUNCILOR DIRKSEN:** Thank you.

7 Chris Carpenter followed by Serge
8 Killingsworth.

9 **MR. CARPENTER:** Good evening, Members of
10 the Committee. I'll keep it pretty brief. My name
11 is Chris Carpenter. I'm the Political Director for
12 the Oregon and Southern Idaho District Council of
13 Laborers. We focus primarily on construction, but we
14 have a lot of public employees that are a third of
15 our membership -- public employees for the City of
16 Portland and the metro. We have about 3500 members
17 within Oregon and Southern Idaho. Most of them are
18 based in Oregon.

19 I just want to start off, we strongly
20 support the proposal. I will focus more, though --
21 there's obviously a couple pieces that impact our
22 members, but I want to focus a little bit more on
23 how it directly impacts our members' lives. Within
24 Washington County and Multnomah County, we have just
25 shy of 2,000 of our 3500, so they're primarily based

1 here. There's kind of two ways that this impacts
2 them.

3 One is that our public employees obviously
4 -- transportation to and from the city, the county
5 or the metro facility is pretty important so they
6 might actually use the light rail system. On the
7 other end of it, though, our construction members
8 with the growth in the Portland metro area -- it's
9 not looking like it's going to slow down anytime
10 soon -- do have to get to and from job sites. I'm
11 not sure how familiar most of you are with the
12 construction industry, but they are long hours and
13 they are often unpredictable hours.

14 So when you spend 10 to 12, potentially 14
15 hours a day getting the job done on time, and then
16 you have to potentially sit in traffic for three or
17 four hours just to get home, that makes for kind of
18 a long commute. We're really focused on making sure
19 that not only can they be at the job on time
20 wherever it is, but also so they can get home and
21 see their families as quickly as possible. We do
22 think the light rail, adding it into the southwest
23 corridor, is going to help relieve a lot of that
24 congestion that they face, as well as adding on
25 alternative methods for those members who might be

NAEGELI
DEPOSITION AND TRIAL



(800)528-3335
NAEGELIUSA.COM

1 able to use it. Again, less so on the construction
2 site, but very true on the train.

3 Outside of that, we do believe it is a big
4 opportunity for the area, and if we are able to move
5 forward pretty quickly, we are also excited to build
6 it for you. Appreciate all you're doing. Thank
7 you.

8 **COUNCILOR DIRKSEN:** Thank you. Sergio
9 Killingsworth -- or is it Serge?

10 **MR. KILLINGSWORTH:** Serge.

11 **COUNCILOR DIRKSEN:** I've known people with
12 both spellings. Thank you for coming.

13 **MR. KILLINGSWORTH:** Good evening. My name
14 is Serge Killingsworth. I'm a member of the
15 Southwest Corridor Citizen's Advisory Committee and
16 a member of the City of Tigard Pedestrian and
17 Bicycle Subcommittee of the Transportation Advisory
18 Committee.

19 I support the IRP and I would like to draw
20 attention to some benefits this project provides to
21 the citizens of Tigard, who might not even use the
22 light rail. First, the IRP stipulates a bridge
23 across Highway 217, that is to include a pedestrian
24 and bicycle path. This bridge will allow cyclists to
25 avoid the difficult and dangerous crossing on

NAEGELI
DEPOSITION AND TRIAL



(800)528-3335
NAEGELIUSA.COM

O17: Oregon Health & Science University, Portland State University and Portland Community College

Email:

From: [Eryn Kehe](#)
To: [swcorridordeis](#)
Subject: Fwd: SW Corridor Support Letter
Date: Friday, July 27, 2018 5:13:46 PM
Attachments: [OHSU PSU PCC Letter 72717.pdf](#)

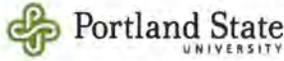
----- Forwarded message -----

From: Kathleen McMullen <[REDACTED]>
Date: Jul 27, 2018 3:59 PM
Subject: SW Corridor Support Letter
To: Clint Culpepper <[REDACTED]>, Michael Harrison <[REDACTED]>, Eryn Kehe
<Eryn.Kehe@oregonmetro.gov>
Cc:

Attached is the completely signed letter. Thanks Michael this was a great idea.
Should one of us bring a hard copy to the meeting, perhaps all of us?

Kathleen McMullen
Portland Community College
District Manager
Transportation and Parking Services
[REDACTED]

Attachment:



July 25, 2018

Dear Mayor and City Commissioners,

This letter expresses the consensus thoughts of Oregon Health & Science University (OHSU), Portland Community College (PCC) and Portland State University (PSU) on the Draft Environmental Impact Statement for the SW Corridor Light Rail project. While each of our institutions have unique perspectives and needs that we may share independently from this letter, we think it is important to note our collective support.

As a starting point, we want to make it clear that this is an extremely important project for our institutions and those we serve. Collectively, we represent 105,000 students, 23,000 employees and 250,000 patients. These community members have many different backgrounds, different socioeconomic status, and differing abilities – all of whom have a common desire to better their lives and the lives of others through education and health care. Regardless of whether they live directly along the future SW Corridor Light Rail alignment or not, this transportation investment will provide a critical transportation link for many. This is true of transit users as well as those who would benefit from associated bicycling and pedestrian facilities along the route.

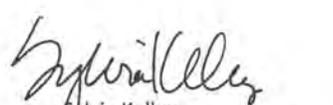
As you know, OHSU, PCC and PSU strongly encourage transit usage and have robust travel demand management programs (reduced-rate transit passes for employees and students, and various programs promoting bicycle transportation). These programs help keep thousands of vehicles off the road each day and decrease the use of fossil fuels. But there are limits to what we can do on our own – we need safe and convenient infrastructure in place to successfully encourage people to get out of their cars. The SW Corridor Light Rail line would provide significantly improved access to our academic facilities, hospitals and clinics.

There are three specific issues we are tracking which are extremely important to us. First, although the PSU campus would be directly served by the SW Corridor project, the light rail station locations identified in the DEIS are near but not directly connected to OHSU or PCC. It is important to note that robust connections to OHSU and PCC are critical to making the project a success. Second, we support the SW Barbur alignment (versus the Naito alignment) as the most convenient route for most of our users. Lastly, we strongly support a project design that achieves significant bicycling and pedestrian improvements throughout the corridor.

Thank you for providing this opportunity to share our feedback on this important project.


Connie Seeley
Oregon Health & Science
University
Executive Vice President and
Chief Operating Officer


Dan Zalkow
Portland State University
Associate Vice President for
Planning, Construction and
Real Estate


Sylvia Kelley
Portland Community College
Executive Vice President

O18: Oregon Walks

Email:

From: [Roger Averbeck](#)
To: [swcorridordeis](#)
Subject: Oregon Walks Comment Letter RE SW Corridor DEIS
Date: Thursday, July 19, 2018 12:46:37 PM
Attachments: [Oregon Walks Letter RE SW Corridor DEIS 7 19 18.pdf](#)

Please see the attached letter from Oregon Walks RE the SW Corridor DEIS. Please share this letter with the SW Corridor Steering Committee. Thank you very much.

Roger Averbeck
Oregon Walks Plans & Projects Committee



PROTECTING YOUR
RIGHT TO ROAM

July 19th, 2018

To: SW Corridor Light Rail Project Steering Committee
Re: Comments on SW Corridor Draft Environmental Impact Statement (DEIS)

Oregon Walks is the state's pedestrian advocacy organization. We work to make walking a safe, convenient, and accessible transportation option in every community, for all Oregonians. We appreciate having representation on the SW Corridor (SWC) Citizen's Advisory Committee and the opportunity to comment on the SW Corridor DEIS.

In Segment A (Inner Portland), Oregon Walks recommends Alignment A2-BH (Naito with Bridgehead Reconfiguration).

- The Naito alignment is preferred because Naito Parkway and the western interchange of the Ross Island Bridge are long overdue for safety and accessibility improvements for all modes. This alignment better serves the National University of Natural Medicine (NUNM) and Portland's South Waterfront. Much of the future growth of the Oregon Health Science University (OHSU) research and training facilities will be in the South Waterfront. OHSU's faculty, staff and students are more likely to use LRT than medical patients and their families accessing the OHSU and Veterans Administration facilities on Marquam Hill.
- Oregon Walks supports either of the proposed Marquam Hill Connections: Connection 1B (Elevator/Bridge and Recessed Path); or Connection 1C (Elevator/Bridge and Tunnel), whichever option provides the best and safest access for OHSU patients and staff.
- If Alignment A1 (Barbur) is selected, it should include the Ross Island Bridgehead Option (A1 – BH). The Locally Preferred Alternative must include a recommendation that the Ross Island Bridgehead project becomes a regional priority, to initiate additional planning and design work in the South Portland Focus Area, to be competitive for funding and successful in meeting city, county, regional and state goals.
- Alignment A1 – BH must include crossing safety improvements on Naito Parkway at Gibbs Street to improve access to the pedestrian bridge over I – 5, as well as crossing improvements on Naito at SW Hooker St to access NUNM.
- Segment A must include complete active transportation facilities through the "Woods" section of Barbur, even if Design Refinement 1 (Barbur Woods East-Side Running) advances. Since the Newberry and Vermont Viaducts will need eventual replacement, consider adding a north bound vehicle travel lane as well as a multi-use path to the new LRT bridges, creating space for active transportation on the existing viaducts.

Oregon Walks | PO Box 2252 | Portland, OR 97208 | www.oregonwalks.org | 503-223-1597



PROTECTING YOUR
RIGHT TO ROAM

In Segment B (Outer Portland), Oregon Walks recommends Alignment B1 (Barbur). This alignment best supports the City of Portland's land use vision embraced by the Barbur Concept Plan and Comprehensive Plan designation as a Civic Corridor; offers the opportunity to transform Barbur Blvd into a complete street that serves all modes.

- If Alignment B2 (I-5 Barbur TC to 60th) is selected, active transportation safety improvements to the West Portland Crossroads must be included to improve access to the Barbur Transit Center and surrounding businesses.
- If Design Refinement 2 (Taylor's Ferry) advances, the new crossing over I – 5 must include a multi-use path for bicycles and pedestrians. This option must include active transportation improvements on Taylor's Ferry Road west to SW 48th Ave and be proven to mitigate traffic congestion in the Crossroads.
- In both Segments A and B, we support jurisdictional transfer of Barbur Blvd from ODOT to PBOT.

In Segment C (Tigard and Tualatin), Oregon Walks recommends Alignment C2 (Ash to Railroad); including Design Refinements: 4 (Barbur Undercrossing); 5 (Elmhurst); and 6 (Tigard Transit Center Station East of Hall).

- The City of Tigard should reassess the station access project list for a new proposed station at SW 68th Ave, to provide active transportation improvements at SW 68th, along Hwy 99W and north into the community.
- The new overpass of Hwy 217 in Design Refinement 5 (Elmhurst) should include a multi-use path to connect the Tigard Triangle with downtown Tigard.
- Oregon Walks supports station access improvements to Hall Blvd; and recommends that pedestrian access from the Hall Station to the WES Station and downtown Tigard be brought up to modern standards.
- We support the Railroad alignment south to Bridgeport Village; it better serves the underserved residential communities to the west of the Bonita Station.
- Throughout the SW Corridor, we support median or center platform LRT station locations that are fully visible and accessible, not hidden behind park and ride garages or isolated from nearby businesses and public view.
- Oregon Walks recommends that all active transportation improvements in the SW Corridor be designed & built using best practices and modern guidelines.

Thank you very much for considering these comments on the SW Corridor DEIS.

Sincerely, 
Roger Averbeck
Oregon Walks Plans and Projects Committee

Oregon Walks | PO Box 2252 | Portland, OR 97208 | www.oregonwalks.org | 503-223-1597

1 trains per hour?

2 Perhaps a more accurate projection for the
3 final EIS of the project will be written on the
4 basis of five or six trains per hour, not nine. If
5 somehow we saw a drastic increase in the speed of
6 light rail in Portland, we might be able to possibly
7 reach the 2035 projections for the southwest
8 corridor. But given the transfer speed of the light
9 rail, this is also highly implausible. You can see
10 in figure 3 on the next page, the average speed of
11 light rail in Portland has been trending downward
12 consistently since the year 2000. This is data
13 available from TriMet's annual ridership reports.

14 So overall, MAX has a consistent track
15 record of over-promising and under-performing, and
16 it's likely to be no different if the southwest
17 corridor plan moves forward. Given the failure to
18 deliver effective service, we can clearly see that
19 expanding light rail in the southwest corridor would
20 be a faulty transit investment. Thank you.

21 **COUNCILOR DIRKSEN:** Thank you.

22 Roger Averbeck followed by Matt Engen.

23 **MR. AVERBECK:** I am Roger Averbeck. I
24 trust it's a coincidence that I am the 13th speaker
25 tonight. I am representing Oregon Walks --

1 MR. DIRKSEN: Fourteen. We had one person
2 who left. You're 14 on my card.

3 MR. AVERBECK: Thank you. So I am
4 representing Oregon Walks, the statewide pedestrian
5 organization. We do appreciate the opportunity to
6 comment tonight as well as the representation on the
7 CAC. Due to the time limits tonight, I am forced to
8 use acronyms, and for that I apologize.

9 We do want to provide you with written
10 comments as well my verbal testimony. And we will
11 just go through these very quickly by segment. In
12 segment A, which is inner Portland, we recommend
13 alignment A2/BH, which is Naito with the bridge head
14 configuration. We'd prefer that, because the Naito
15 Parkway and the western interchange Ross Island
16 Bridge is long overdue for safety and accessibility
17 improvements.

18 We believe that this alignment better
19 serves the NUNM and Portland south waterfront. We
20 expect that much of the future growth of OHSU
21 research training facilities will be in south
22 waterfront. And their faculty, staff, and students
23 are more likely to use light rail than actually the
24 medical patients and families trying to access the
25 facilities at OHSU and the VA on Marquam Hill.

NAEGELI
DEPOSITION AND TRIAL



(800)528-3335
NAEGELIUSA.COM

1 Oregon Walks will support either of the
2 proposed Marquam Hill connections, connection 1B and
3 1C, which need further study to sort out how those
4 are going to work. If alignment A1 is selected,
5 which is on Barbur, it definitely should include the
6 Ross Island bridge head option, A1/BH. The locally
7 preferred alternative must include a recommendation
8 that the Ross Island bridge head project becomes a
9 regional priority to initiate the additional
10 planning and design work in the south Portland focus
11 area to be competitive for funding and successful in
12 meeting the city, county, regional, and state goals.
13 A1/BH must also include crossing safety improvements
14 in that bridge head area.

15 Also in segment A, it must include
16 complete active transportation facilities throughout
17 the wooded section of Barbur, even if design
18 refinement 1, which is the Barbur eastside running
19 advances. Since the Newbury and Vermont viaducts
20 will need eventual replacement, we've asked ODOT to
21 provide what their useful life is. You should
22 consider adding the northbound vehicle lane as well
23 as a multi-use path to the light rail bridge on the
24 east side, which would create space for active
25 transportation on the existing viaducts.

NAEGELI
DEPOSITION AND TRIAL



(800)528-3335
NAEGELIUSA.COM

1 In segment B, Portland Oregon Walks
2 recommends alignment B1 on Barbur. This alignment
3 best supports the City's land use vision embraced by
4 the Barbur concept plan and the City's comp plan
5 designation as specific corridor offers the
6 opportunity to transfer Barbur Boulevard into a
7 complete street. If alignment B2, I-5, Barbur TC to
8 60th is selected, then we need active transportation
9 safety improvements in the crossroads area. And if
10 designing refinement Taylors Ferry advances, the new
11 crossing over I-5 must include a multi-use path for
12 bikes and pedestrians. The rest of my testimony is
13 in the letter, and I appreciate you considering
14 that. Thank you very much.

15 COUNCILOR DIRKSEN: Thank you.

16 Matt Engen followed by Mark McGirr.

17 MR. ENGEN: Good evening, ladies and
18 gentlemen. I appreciate you giving us the
19 opportunity to speak. I know some of you, and I am
20 here in my official capacity as a Tigard resident
21 and someone who lives within about a mile of the
22 proposed terminus of this extension.

23 I'd like to talk about something that
24 isn't directly related to right-of-ways or
25 alignments or whatnot, but something that has come

NAEGELI
DEPOSITION AND TRIAL



(800)528-3335
NAEGELIUSA.COM

1 riders paying fares that barely cover 25 percent of
2 the operating costs. The riders need to bear some
3 of the financial responsibility for this project
4 with increased fares. Likewise, instead of
5 freeloading on the shoulders of motorists, adult
6 bicyclists need to start paying some sort of license
7 and/or user fee for the bicycle infrastructure that
8 will be included in the project. Maybe this is
9 where tolling should apply.

10 Thank you.

11 MS. KEHE: Thank you very much.

12 Roger Eberman, followed by Bryan Sweeney.

13 **ROGER EBERMAN:** Hi, I'm Roger Eberman
14 representing Oregon Walks, a statewide pedestrian
15 advocacy organization. I was here last week and
16 only got halfway through my testimony due to time
17 limits so hopefully I'll finish tonight. And I
18 appreciate the second opportunity to cover page two
19 of my testimony, which has already been submitted in
20 writing, yes.

21 And to quickly overlap, I was in segment
22 B, outer Portland, and Oregon Walks represents
23 alignment B1, which is in Barbur. We understand the
24 difference from the IRP route proposal, which is B2,
25 but the emphasis should be on if that's solely to

1 actually make the necessary improvements in west
2 Barbur crossroads that will provide safe access for
3 all modes to the Barbur transit center and
4 surrounding businesses.

5 If design refinement two on Taylors Ferry
6 advances, we do recommend there be a new crossing
7 over I5 that includes a multi-use path for bikes and
8 peds. And we also recommend this option include
9 active transportation improvements on Taylors Ferry
10 Road west all the way to Southwest 48th.

11 And, also, BR2 must be proven to mitigate
12 traffic congestion in the crossroads. You cannot
13 avoid those issues and be successful.

14 Finally, in segments A and B, Oregon Walks
15 supports jurisdictional transfer Barbur Boulevard
16 from ODOT to PBOT.

17 Moving on into segment C, which is in
18 Tigard and Tualatin, Oregon Walks recommends the
19 following alignments, C2, which is Ash to Railroad.
20 And we also support and recommend further study of
21 design refinements, number four, which is a Barbur
22 under crossing, number five, Elmhurst, and number
23 six, Tigard Transit Center station which is east of
24 Hall Boulevard.

25 For the City of Tigard, they should

NAEGELI
DEPOSITION AND TRIAL



(800)528-3335
NAEGELIUSA.COM

1 reassess the station access project list for a new
2 station at Southwest 68th. That was a project that
3 was developed several years ago and no station at
4 68th was considered at that time so we do need
5 additional active transportation improvements that
6 will serve the community around that station
7 location. If there's a new overpass in designing
8 refinement five, Elmhurst, it will include a multi-
9 use -- it should include a multi-use path to connect
10 the triangle with downtown. Oregon Walks supports
11 the station access around Hall Boulevard and
12 recommends that you bring -- any access for
13 pedestrians from the Hall station to the West
14 station in downtown Tigard should be up to modern
15 standards. We support the Railroad alignment to
16 Bridgeport Village and that better serves the
17 community to the west of Bonita station. Throughout
18 the corridor we support needing a centered platform.
19 Light rail needs station locations fully visible and
20 accessible and not hidden behind park and ride
21 garages or isolated from nearby businesses.

22 And finally, we recommend that all active
23 transportation improvements in the corridor be
24 designed and built using best practices, modern
25 guidelines.

NAEGELI
DEPOSITION AND TRIAL



(800)528-3335
NAEGELIUSA.COM

1 Thank you for your time.

2 MS. KEHE: Thank you very much.

3 Bryan Sweeney, followed by Cindy Frost.

4 MR. SWEENEY: Good evening. Brian
5 Sweeney, Village Inn Restaurant. I spoke last week,
6 as well. I'm still opposed to the plan as it is
7 today as it still calls for wiping out my
8 restaurant, my business, my livelihood.

9 Staff has known since December of 2015
10 that Bridgeport Village was going to be the
11 terminance versus downtown Tualatin.

12 I was first notified in June of 2017, and
13 I was curious what happened in those 18 months when
14 you decided that you were going to take the property
15 that my business sits on? What happened in those 18
16 months when I was first notified and when the
17 decision was made to take my property?

18 I'll tell you what happened on my end. I
19 personally made a financial agreement to buy into
20 this business. We finalized the deal in March. And
21 I spoke with you in June and you told me that you
22 were taking my property.

23 I've been participating in this process,
24 participating by going to community action committee
25 meetings, steering committee meetings. I've met

NAEGELI
DEPOSITION AND TRIAL



(800)528-3335
NAEGELIUSA.COM

O21: Portland Bicycle Advisory Committee

Email:

From: [Elliot Akwai-Scott](#)
To: dan@portlandoregon.gov
Cc: chris.wamer@portlandoregon.gov; Geller, Roger; Rithy Khut; [swcorridordeis](#)
Subject: PBAC Letter regarding SW Corridor DEIS
Date: Monday, July 30, 2018 12:12:52 PM
Attachments: [DEIS - SW Corridor - Final.pdf](#)

Commissioner Saltzman,

Please find attached a letter from the Portland Bicycle Advisory Committee with our endorsement of alignment options for the SW Corridor Light Rail Project, and regarding the importance of the presence and design of bicycle facilities along and connecting to the corridor.

On behalf of PBAC Chair Rithy Khut and committee members, thank you for your consideration.

Sincerely,

Elliot Akwai-Scott
Vice Chair, Portland Bicycle Advisory Committee

cc: SW Corridor DEIS

Portland Bicycle Advisory Committee

Working to make bicycling a part of daily life in Portland



July 30, 2018

Dan Saltzman, PBOT Commissioner and City of Portland JPACT Representative for SW Corridor
Portland City Council
1221 SW 4th Avenue
Portland, OR 97204

Dear Commissioner Saltzman,

As members of Portland's Bicycle Advisory Committee (BAC), we advise the City on matters related to bicycling. We are writing today to provide an endorsement of specific SW Corridor Light Rail Project alignment options reviewed in the Draft Environmental Impact Statement (DEIS), and bicycle facilities planned for the SW Corridor in the context of SW Portland.

The BAC supports SW Corridor alignment options A2-LA (Naito with Limited Access) or A2-BH (Naito with Bridgehead Reconfiguration) of Segment A (Inner Portland), and alignment option B1 (Barbur) of Segment B (Outer Portland), and recommends they be adopted as the Locally Preferred Alternative for the City of Portland.

After reviewing the SW Corridor DEIS in detail, we also write to impress the importance of establishing the safest, most convenient, and contiguous bicycle facility along the corridor, in accordance with the City's adopted transportation plans for SW Portland. Transit and bicycles are complementary modes of transportation, both of which support city and regional transportation, climate, and development goals to create a more livable, safe, sustainable, and efficient Portland Metro region. It is essential that a world-class bicycling facility is established along the entire SW Corridor as a part of this project, or an opportunity to establish critical, long-overdue improvements to bicycling in SW Portland may be lost for decades.

In SW Corridor Segment A, alignment options A2-LA and A2-BH bring improvements to address absent bicycle and pedestrian facilities on Naito, and address the maze of ramps connecting the Ross Island Bridge to Naito Pkwy and Barbur Blvd that currently divide the neighborhood while streamlining traffic flows for transit, freight, and other vehicular modes. Disconnecting these improvements from the SW Corridor project will prevent people using light rail from having safe and simple access to the major employment and residential centers in the South Waterfront. Either of the A2 alignment options will improve the ODOT-managed section of Naito Pkwy to a level that will be rideable by bicyclists of all abilities, and link with sections of Naito slated to be improved by planned PBOT projects, especially if Better Naito becomes a permanent fixture of downtown next to Waterfront Park.

Page 1 of 3

In SW Corridor Segment B, alignment option B1 will create a more livable Barbur Blvd as center-running light rail calms traffic on the corridor. This alignment would provide bicycle and pedestrian improvements that create safe options for active transportation on the corridor and adjoining streets. As both a local and regional commercial corridor, it is essential that Barbur Blvd have complete and protected facilities for people bicycling and walking. There are few network alternatives to Barbur Blvd in SW Portland due to the disconnected nature of the road system, and most alternatives are unimproved, unsafe or inefficient routes for bicycling and walking. Barbur Blvd represents the only viable route for attracting “interested but concerned” bicyclists to the corridor.

The bicycle facility along Barbur Blvd and the SW Corridor overall needs to be designed and built with capacity to handle volumes of bicycle traffic that reflect Portland’s transportation mode share goal of 25% of trips made by bicycle. The bicycle facilities on the corridor should reflect this vision, rather than being designed to serve current volumes present on the corridor which features some of the least connected, inconvenient, and neglected bicycle infrastructure in the city. People bicycling along the SW Corridor must be protected from cars and able to connect easily with other bicycling routes in SW Portland. Placing bicyclists in a single lane protected by plastic wands next to multiple lanes of high speed car traffic will not be successful. The gentle elevation change both in and out of downtown means there will be significant variability in bicycle speeds between users, necessitating a passing lane in both directions. Connectivity is critical in SW Portland, where grid simply does not exist as it does in other parts of the city. Alignment B1 will provide as much useful bike infrastructure on Barbur as possible to grow the number of intersecting roads that are part of the bike network.

In addition to the specific alignment alternatives, the BAC is concerned about several dimensions of the SW Corridor project shown in the DEIS that are critical to its success as a comprehensive, safe and resilient multimodal transportation facility. Elements of concern include bicycle parking, improvements to the surrounding bicycle network, and the overall cross section of the corridor.

Bicycle parking at light rail stations should be plentiful, free, and secure, to encourage combining transit with active transportation. Car parking spaces at Park and Ride stations are tallied in tables in the DEIS Summary, but bicycle parking spaces are not noted. Planning and design for station areas must allocate space and investment in a way that reflects planning goals, rather than reproducing current auto-dependent travel patterns. In a City that strives to create a transportation system that supports 25% of trips taken by bicycle, and 30% by single-occupancy vehicle, the capacity of supporting infrastructure for transit should reflect ratio.

For Segments A and B, all renderings in the DEIS provided show a cross section that maintains full access to auto lanes while adding space for light rail, buses, pedestrians, and bicycles. This design is not reflective of Portland’s Climate Action Plan and Transportation System Plan mode share goals. A decision to maintain the status quo of capacity for single occupancy vehicles adds substantial cost to the project, and counteracts safety improvements on stretches of road where the 85th percentile speed reaches 55 MPH. Transportation is now the largest source of greenhouse gas emissions in the United States. Any action to “achieve a 40 percent reduction in carbon emissions by 2030 and 80 percent reduction by 2050 (compared to 1990 levels)” needs to address this head on. Designing roadways that make it easier to drive at the cost of other modes of transportation will prevent achieving these goals regardless of progress made elsewhere. Reducing use of single occupancy vehicles creates positive feedback effects by diminishing emissions, decreasing crashes, and increasing the share of people using other modes of transportation. Maintaining all of the current auto lanes is not in line with Vision Zero goals, as there is a direct link between vehicle miles traveled and incidence or crashes involving autos. Currently one of the City’s High

Crash Corridors, the SW Corridor project is an opportunity to transform Barbur Blvd from an urban highway to a neighborhood and regional main street that promotes human access and liveability.

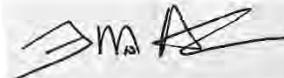
Finally, the Vermont & Newbury bridges must be addressed by the SW Corridor project. ODOT has stated that though these bridges are historically significant, they lack the seismic resilience to survive a major earthquake. They also provide little to no refuge for people bicycling and walking. In fact, improvements to these critical choke points in the SW Portland transportation network does not need to wait for the SW Corridor project to start before making safety enhancements to these bridges. In Explored Option #5 for the Vermont & Newbury bridges in the 2015 Barbur Road Safety Audit, ODOT stated that on southbound Barbur Blvd one auto lane could be dropped, creating space for bicycle lanes on both sides of the bridges as there is a “consistent split of traffic volumes between Southbound Barbur Boulevard and Southbound SW Capitol Highway.” Taking this step would also improve pedestrian safety by increasing separation between cars and pedestrians. Neither the Vermont nor Newbury Bridge has bicycle or pedestrian facilities that come close to meeting current standards. Any SW Corridor alignment option that does not directly include the Vermont & Newbury bridges in the project alignment must include corresponding, protected bicycle and pedestrian infrastructure on these bridges if they are not already constructed by a separate, earlier improvement project. Bicycle and pedestrian improvements to the bridges have long been hand-waved and deferred to the SW Corridor project, and now the revelation that a SW Corridor alignment might omit them is of grave concern. Bicycle and pedestrian improvements should be made now across the Vermont & Newbury bridges.

Thank you for your consideration.

Respectfully, on behalf of Portland’s Bicycle Advisory Committee,



Rithy Khut, Chair
Bicycle Advisory Committee



Elliot Akwai-Scott, Vice-Chair
Bicycle Advisory Committee

Cc: SW Corridor DEIS

O22: Portland Business Alliance

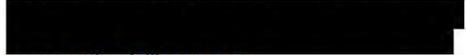
Email:

From: [Nathaniel Brown](#)
To: [swcorridordeis](#)
Cc: [Eryn Kehe](#)
Subject: Portland Business Alliance Letter re: SW Corridor
Date: Monday, July 30, 2018 3:35:02 PM
Attachments: [PBA SW Corridor DEIS Comment \(7_30_18\).pdf](#)

Good afternoon,

Attached please find a letter from the Portland Business Alliance commenting on the Draft Environmental Impact Statement for the SW Corridor Light Rail Project. I attempted to submit via the website, but it won't allow a PDF. Please let me know if you need me to submit a different version through the website. Thank you for your consideration.

Nathaniel Brown | Government Relations Specialist
Portland Business Alliance, *Greater Portland's Chamber of Commerce*



www.portlandalliance.com



Connect with the Alliance on:



Attachment:



July 30, 2018

Metro Council President Tom Hughes
600 NE Grand Ave.
Portland, OR 97232

TriMet General Manager Doug Kelsey
1800 SW 1st Avenue, Suite 300
Portland, OR 97201

Dear President Hughes and Mr. Kelsey:

The Portland Business Alliance (Alliance) appreciates the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the Southwest Corridor Light Rail Project. As Greater Portland's chamber of commerce, the Alliance represents more than 1,900 small, medium and large businesses throughout the Portland metro region. We have long been a strong supporter of an efficient multimodal transportation system to effectively move both goods and people. With congestion a growing issue in Portland and in our neighboring cities, the Southwest Corridor Light Rail Project presents a unique opportunity to promote mass transit as a viable transportation alternative for our emergent southwest region and to complement the robust economic development already occurring there.

The Alliance believes that light rail transit (LRT) poses the greatest opportunity to meet projected ridership demand in the corridor due to greater capacity and more efficient and reliable travel times. We appreciate that TriMet and Metro have partnered with the impacted cities and with the Oregon Department of Transportation to evaluate the best route options through the DEIS. We understand that the initial route proposal, also known as the preferred alternative, is a 12-mile route with 13 stations from downtown Portland to Bridgeport Village via Barbur Boulevard and through downtown Tigard along the existing railroad (respectively known as the A1, B2 and C2 alignment).

In coordination with our member businesses in the region, and consistent with project staff recommendations, the Alliance strongly supports the initial route proposal as outlined in the DEIS.

While we are supportive of the proposal, we must note that implementation of LRT should in no way result in a loss of existing vehicle capacity on Southwest Barbur Boulevard (Oregon Highway 99W). Barbur is a significant state road that provides crucial access to southwest and downtown Portland for daily commuters and freight vehicles. Cars will remain the preferred mode of transportation for residents in the region and they must be accommodated.

Other alternative routes along I-5, studied as part of this evaluation, would require the demolition of several existing buildings and would run counter to economic development goals in southwest Portland and the city of Tigard. For this reason we would like to strongly advocate for the adoption of

Greater Portland's Chamber of Commerce

200 SW Market Street, Ste. 150 | Portland, OR 97201 | 503-224-8684 | FAX 503-323-9186 | www.portlandalliance.com

Southwest Corridor Light Rail Project
Page 2

the C2 alignment option, also known as the Ash-Railroad segment. While all of the options outlined have significant impacts to existing residential units as well as businesses, the initial route proposal appears to have the least negative impact and we encourage TriMet and Metro to be transparent in their approach to necessary displacements and acquisitions.

Of course, a capital project of this magnitude presents a significant cost. We appreciate that the preferred Inner Portland (A1) and Tigard and Tualatin (C2) segments are the lowest cost options for the respective segments. Identifying and committing local funds, and requesting matching federal funds, will require the broad support of the community. More clarity on the cost to the region's taxpayers is needed as the final environmental impact statement is developed and the preferred alternative is adopted.

The Alliance looks forward to engaging with Metro, TriMet and other partners as the Southwest Corridor Light Rail project comes to fruition. As this process moves forward, we encourage the government entities leading this project to identify minority- and women-owned businesses to contract with for the development of each phase of the project, or when appropriate. The Alliance also would like to work with Metro and TriMet to convene a business stakeholders listening session once the preferred alternative is adopted.

Properly planned and designed, a new LRT line would improve connections to employment and commercial centers, mitigate congestion impacts on the environment, and increase access to quality middle-income jobs, educational opportunities and services for the growing Southwest Corridor.

Thank you for your consideration.

Sincerely,



Dave Robertson
Chair

O23: Portland Freight Committee

Email:

From: [Eryn Kehe](#)
To: [swcorridordeis](#)
Subject: FW: Southwest Corridor DEIS Comments
Date: Thursday, July 19, 2018 2:28:37 PM
Attachments: [SW Corridor DEIS Comment Letter.pdf](#)

From: Hillier, Robert [mailto:Robert.Hillier@portlandoregon.gov]
Sent: Thursday, July 19, 2018 2:23 PM
To: Eryn Kehe; John Gillam; Igarta, Denver
Cc: Pia Welch; Ansary, Raihana
Subject: Southwest Corridor DEIS Comments

On behalf of the Portland Freight Committee please find attached a comment letter to be entered into the public record as part of the Southwest Corridor DEIS project. Please feel free to contact the PFC officers (cc'd) or myself if you have any questions regarding these comments.

Bob Hillier
Freight Planning Coordinator
City of Portland Bureau of Transportation
1120 SW 5th Avenue, Suite 800
Portland, Oregon 97204
Phone: 503 823-7567
E-Mail: Robert.hillier@portlandoregon.gov

Attachment:



July 19, 2018

Eryn Kehe
Metro
600 NE Grand Ave, Portland, OR 97232

PORTLAND FREIGHT COMMITTEE

Re: Southwest Corridor Light Rail Project DEIS Comments

On behalf of the Portland Freight Committee we are writing to express our overall support for the Southwest Corridor Light Rail Project as identified in the Draft EIS document over the No Build alternative. The Southwest Corridor Light Rail Project has the potential to significantly enhance our region's existing light rail network by providing high quality public transit service to area residents and businesses and providing a viable alternative to driving.

The Portland Freight Committee (PFC) has been serving as an advisory group on freight mobility issues to Portland City Council since 2003 and is comprised of over 30 members that include both public and private sector representatives. Our mission is to enhance the Portland economy by advancing a balanced and well managed multi-modal freight network. Upon reviewing the Southwest Corridor DEIS document we offer the following comments:

TSP Policy Issues

Within the City of Portland SW Barbur Blvd/99W is classified as a *Major Truck Street* in the City's Transportation System Plan and intended to provide truck mobility and access to commercial and employment uses along the corridor and to accommodate all truck types as practicable. The PFC would like to ensure that truck access and mobility along the Barbur Blvd corridor is maintained and would like further clarity on the following:

- What would be the corridor-wide impact to truck travel and access to local businesses on Barbur Blvd?
- What would be the impact to truck travel in the single-lane section of Barbur Blvd, north of SW Hamilton?
- Will there be any delays to truck movement due to new at-grade LRT crossings along the corridor?
- What is the impact to truck travel to and from the off-street loading bays at the Burlingame Fred Meyer and other businesses that require large truck access?
- What are the expected delays and out of direction travel for trucks that will not be able to make left turns within the project area? What proposed design solutions are being proposed to ensure adequate truck access and turning movements within the impacted area?
- What level of outreach to the businesses along Barbur Blvd have taken place in respect to identifying their truck access and loading needs?

Over-Dimensional Truck Issues

All parts of State Hwy 99W (aka SW Pacific Hwy) up to the I-5 ramps at Exit 294 is identified as a state *Reduction Review Route* and subject to *ORS 366.215* guidance which states that the Oregon Transportation Commission may not permanently reduce vehicle-carrying capacity of identified freight routes and that a review of potential Reduction of Vehicle-carrying Capacity is required for all proposed actions on Reduction Review Routes. This segment of 99W has also been identified as a Regional Over-Dimensional Truck Route Corridor in a recently completed Metro planning effort. The PFC would like to ensure that adequate access is maintained for Over-dimensional vehicle movements as required under ORS 366.215 guidance and would like further clarification on the following:

- What level of coordination has taken place with ODOT's Region Mobility Liaison to address freight access in respect to ORS 366.215 guidance?
- What design considerations are being proposed to maintain access for Over-dimensional vehicles along the study corridor, including the intersection of Hwy 217 which is also a state Reduction Review Route?
- If jurisdictional ownership of Barbur Blvd is transferred to the City of Portland will ORS 366.215 guidance still apply where it connects with Hwy 99W at the I-5 ramps and will an expiration time limit be applied?

Portland Freight Committee ■ 1120 SW Fifth Avenue, Room 800 ■ Portland OR 97204

Several other roadways within the study area that intersect with Barbur Blvd are also identified as “Preferred wide load routes” by the City of Portland include connections with Capital Hwy and Beaverton-Hilldale Hwy (aka State Route 10) Bertha Blvd and Multnomah Blvd. These facilities were designated as wide load routes based on their direct connections with state Hwy 99W with the expectation that Over-dimensional vehicles will continue to be accommodated on the designated state facility without any disconnected segments that link to a state-owned facility. The PFC wants to ensure direct access to these city-owned wide load routes are maintained from Hwy 99W and other state-owned facilities and would like further clarity on the following:

- What assessment has been done to address direct access from Hwy 99W/Barbur Blvd to city designated wide load routes in respect to turning radius, travel lane width and vertical clearance needs to accommodate these type of truck movements?
- Have the potential impacts from other area capital improvement projects - such as the S.W. Capitol Hwy: S.W. Taylors Ferry Rd. to S.W. Garden Home Rd roadway improvements, also been incorporated into the DEIS traffic analysis?

I-5 and Barbur Blvd/99W Traffic Issues

Interstate 5 serves as a vital trade link on the national freight network linking all three western states with Canada and Mexico. Traffic congestion on I-5 in the Portland region has been identified by businesses statewide as a major choke point that adversely impacts efficient freight movement and restricting economic growth. Projected regional population and employment growth will further strain the existing roadway network and available vehicle carrying capacity. The segment of Hwy 99W that runs parallel with I-5 within the study area serves as a vital alternative route for freight movement and traffic flow when I-5 is blocked by traffic or other incidents. The PFC would like to ensure that sufficient highway system redundancy is maintained in the Southwest Portland region and that vehicle carrying capacity on Barbur Blvd/99W is not reduced and would like further clarification on the following:

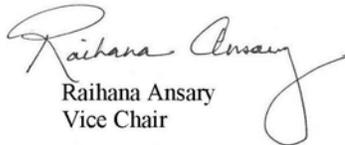
- Will truck movement on I-5 be adversely impacted with this project and to what degree?
- What level of automobile traffic is the project expected to remove from I-5 and Barbur Blvd and what level of traffic diversion is anticipated?
- What changes to vehicle carrying capacity on I-5 and Barbur Blvd are anticipated with the proposed LRT alignment?

The PFC appreciated the opportunity to provide our feedback on this important regional transit project and we look forward to your responses to the issues referenced above.

Sincerely,



Pia Welch
Chair



Raihana Ansary
Vice Chair

Portland Freight Committee ■ 1120 SW Fifth Avenue, Room 800 ■ Portland OR 97204

O24: Portland Historic Landmarks Commission

Email:

From: [Adam, Hillary](#)
To: [swcorridordeis](#)
Cc: [Kristen Minor](#); [Matthew Roman](#); [Wendy Chung](#)
Subject: Public Comments on SW Corridor DEIS
Date: Monday, July 30, 2018 6:07:14 PM
Attachments: [PHLC to METRO - Southwest Corridor.pdf](#)

Please accept the attached testimony on behalf of the Portland Historic Landmarks Commission regarding the SW Corridor DEIS.

Thank you.

Hillary Adam, Senior Planner
City of Portland, Bureau of Development Services
Design & Historic Resource Review Team
1900 SW 4th Ave, Suite 5000
Portland, OR 97201

hillary.adam@portlandoregon.gov
p: 503.823.3581
M-F 9:00-6:30

Attachment:



City of Portland
Historic Landmarks Commission

1900 SW Fourth Ave., Suite 5000 / 16
Portland, Oregon 97201
Telephone: (503) 823-7300
TDD: (503) 823-6868
FAX: (503) 823-5630
www.portlandonline.com/bds

July 30, 2018

Southwest Corridor
METRO
600 NE Grand Ave.
Portland, OR 97232

Dear SW Corridor Planning Group/ Oregon Metro,

The Portland Historic Landmarks Commission (PHLC) received a briefing from you regarding the SW Corridor Light Rail Project. We appreciate the opportunity to learn about it and to provide comments regarding this important work.

Clearly the project team has already done quite a bit of preliminary study and preparation, including a cultural resource survey of the possible alternative routes and an impact study for resources that may be affected. That survey indicated that 144 resources that may be affected are listed in or are recommended to be eligible for listing in the National Register of Historic Places and 16 archaeological sites and recommends that 28 archaeological High Probability Areas be further investigated.

We understand that the project is still in the process of beginning the Section 106 document and that potentially, a Section 4f will also be required in addition to the NEPA review. Based on the number of properties involved, some of which are individually-listed landmarks, it is highly likely that the Section 4f findings cannot be held to "de minimis" and that there will be some adverse effects determined during the Section 106. Therefore, mitigation will likely be a requirement of the project, and the PHLC would be interested in providing input regarding such mitigation.

In general, project alignments are divided into three segments (A, B, C) and then there are some other aspects of the proposal, including station access/ parking options for segments B and C and a few other alterations to the existing conditions that may have the potential to affect historic resources.

In segment A, the Barbur alignment seems generally far better in terms of limiting overall historic impacts. The Barbur alignment keeps the route at the periphery of the South Portland Historic District rather than cutting through it along Naito. At the historic district in particular, the District really is the overarching concern and having anything that creates a barrier within the neighborhood itself must be considered a big adverse effect. It is worth mentioning that this "barrier" effect may also come into play at segments further south and be a negative impact to individual resources, even though this upper segment is the only area with a designated Historic District. Appendix A, Sheet 2 in particular is very concerning in terms of the Naito alignment, even with the understanding that some of the impacts to the identified historic resources could be relatively minor. Appendix A, Sheet 4, continuing south on Barbur, shows quite a number of worrisome impacts (especially to one individually-listed National

Register property, Jewish shelter home at 4133 SW Corbett) but no real alternative in terms of alternative route. If it is not possible to find an alternate within this portion of segment A, the PHLC would like to see some real effort to highlight, mitigate, or otherwise limit the impact to this resource in particular and to other resources sharing the context of its association with immigrant history. Preservation of historic structures that tell these stories is becoming more important in Portland as they are seemingly more easily "erased" than other cultural stories or backgrounds as the city population continues to grow exponentially.

Segments B and C do not seem to create major impacts to historic resources at this point in time. All the Segment C alternatives appear to have the same historic impacts. However, the chart on p83 of the AINW study, Segment B alternatives (B1, B2, B3, or B4) did list some real difference in terms of numbers and allocations of historic resources. The study concludes on the next few pages (85-86) that B4 would have the least number of impacts to historic resources. The PHLC tentatively supports this conclusion, with the understanding that the cultural resources survey does not yet provide any real hierarchy of historic resources or study the rarity of certain types of resources. Again, the PHLC will be interested to read the Section 106, NEPA, and Section 4f documents as the project progresses and would appreciate additional briefings as appropriate.

Thank you very much for the briefing and for the opportunity to comment.

Sincerely,



Kristen Minor
Vice Chair of the Portland Historic Landmarks Commission

O25: Portland Pedestrian Advisory Committee Members

Email:

From: [Kenzie Woods](#)
To: [swcorridor@eis](#)
Subject: PAC Member Comments to Southwest Corridor Light Rail Project Draft EIS
Date: Monday, July 30, 2018 1:45:58 PM
Attachments: [SWCorridor_EIS_Final_Comment_Letter_073018.docx](#)

Please see the attached comment letter to the Southwest Corridor Light Rail Project Draft EIS.

A copy of the letter text is below:

July 30, 2018

Southwest Corridor
600 NE Grand Ave.
Portland, OR 97232

Subject: PAC Member Comments to the Southwest Corridor Light Rail Project Draft EIS

As members of the City of Portland Pedestrian Advisory Committee (PAC), we are submitting this comment letter in support of the Southwest Corridor Light Rail Project, with specific support for the project's potential improvements to transportation Portland's Southwest neighborhoods and proposal to improve pedestrian access.

We request that pedestrian safety be prioritized and analyzed in the Final EIS, planned for during operations, and certainly during project construction, not only along the proposed light rail alignment in the immediate vicinity of proposed station platforms, but also into the neighborhoods to be served by the proposed MAX line.

As all residents of southwest Portland know, and as is shown on Figure 3.1-1, few sidewalks or even road shoulders exist in many of Portland's southwest neighborhoods. There is a notable lack of existing safe walking routes to the proposed transit stations (or to bus stops that may ultimately bring riders to the stations). Under current conditions, the safest and most practical choice to access the proposed stations for many of the residents in the adjacent and surrounding neighborhoods will be by personal automobile, therefore there will be increased traffic and a need for parking at the stations. We request that the Final EIS evaluate the travel routes of light rail riders expecting to originate from the nearby neighborhoods as well as passing through nearby neighborhoods to access stations, the demand for parking at the station and in neighborhoods along streets near stations, and that the project include safe pedestrian routes of travel to the stations where traffic is expected to increase. Assessing project impacts to pedestrian safety due to increased traffic accessing the stations should be made a top priority in the Final EIS and should be planned for in the project design. We specifically request that the project include pedestrian infrastructure built as part of the project in order for pedestrians to safely access the light rail stations.

Thank you for your consideration of our comments and requests.

Sincerely,

Portland Pedestrian Advisory Committee Members:

Kenzie Woods
Tiel Jackson
Zoe Klingmann
Elaine O'Keefe

Contact:

Portland Pedestrian Advisory Committee
1120 SW 5th Avenue, Suite 800
Portland, OR 97204

Sent from [Mail](#) for Windows 10

Attachment:

July 30, 2018

Southwest Corridor
600 NE Grand Ave.
Portland, OR 97232

Subject: PAC Member Comments to the Southwest Corridor Light Rail Project Draft EIS

As members of the City of Portland Pedestrian Advisory Committee (PAC), we are submitting this comment letter in support of the Southwest Corridor Light Rail Project, with specific support for the project's potential improvements to transportation Portland's Southwest neighborhoods and proposal to improve pedestrian access.

We request that pedestrian safety be prioritized and analyzed in the Final EIS, planned for during operations, and certainly during project construction, not only along the proposed light rail alignment in the immediate vicinity of proposed station platforms, but also into the neighborhoods to be served by the proposed MAX line.

As all residents of southwest Portland know, and as is shown on Figure 3.1-1, few sidewalks or even road shoulders exist in many of Portland's southwest neighborhoods. There is a notable lack of existing safe walking routes to the proposed transit stations (or to bus stops that may ultimately bring riders to the stations). Under current conditions, the safest and most practical choice to access the proposed stations for many of the residents in the adjacent and surrounding neighborhoods will be by personal automobile, therefore there will be increased traffic and a need for parking at the stations. We request that the Final EIS evaluate the travel routes of light rail riders expecting to originate from the nearby neighborhoods as well as passing through nearby neighborhoods to access stations, the demand for parking at the station and in neighborhoods along streets near stations, and that the project include safe pedestrian routes of travel to the stations where traffic is expected to increase. Assessing project impacts to pedestrian safety due to increased traffic accessing the stations should be made a top priority in the Final EIS and should be planned for in the project design. We specifically request that the project include pedestrian infrastructure built as part of the project in order for pedestrians to safely access the light rail stations.

Thank you for your consideration of our comments and requests.

Sincerely,

Portland Pedestrian Advisory Committee Members:

Kenzie Woods
Tiel Jackson
Zoe Klingmann
Elaine O'Keefe

Contact:

Portland Pedestrian Advisory Committee
1120 SW 5th Avenue, Suite 800
Portland, OR 97204

O26: Portland Planning and Sustainability Commission

Email:

From: [Eryn Kehe](#)
To: [swcorridordeis](#)
Subject: FW: DEIS PSC letter
Date: Tuesday, July 31, 2018 11:16:34 AM
Attachments: [psc_swcordeis.pdf](#)

Agency comment

From: Chris Ford
Sent: Tuesday, July 31, 2018 10:35 AM
To: Eryn Kehe
Subject: FW: DEIS PSC letter

Please add into the DEIS comments

Chris Ford
Investment Areas Project Manager
Metro | Making a great place
503-797-1633
chris.ford@oregonmetro.gov

From: Engstrom, Eric [<mailto:Eric.Engstrom@portlandoregon.gov>]
Sent: Tuesday, July 31, 2018 9:37 AM
To: Chris Ford
Subject: DEIS PSC letter

Chris, attached is the PSC's comment letter. We had some email technical issues last night when it was sent. I'm re-sending. Hopefully it can be accepted.

- Eric

Attachment:



Bureau of Planning and Sustainability
Innovation. Collaboration. Practical Solutions.

Portland Planning and Sustainability Commission

Katherine Schultz, Chair

Michelle Rudd, Vice Chair

Chris Smith, Vice Chair

Jeff Bachrach

Katie Larsell

André Baugh

Andrés Oswill

Ben Bortolazzo

Eli Spevak

Mike Houck

Teresa St Martin

Mark Assam
Federal Transit Administration Region 10
Jackson Federal Building, Suite 3142 915
Second Avenue Seattle, WA 98174

Chris Ford
Metro 600 NE Grand Avenue
Portland, OR 97232

David Unsworth
TriMet 1800 SW 1st Avenue
Portland, OR 97201

The Portland Planning and Sustainability Commission (PSC) has responsibility for the stewardship, development and maintenance of Portland's Comprehensive Plan, Climate Action Plan and Zoning Code. By holding public hearings and discussing issues and proposals, the PSC develops recommendations to share with City Council in hopes of creating a more prosperous, educated, healthy and equitable city.

A central feature of Portland's Comprehensive Plan is directing growth to a network of centers and transit corridors. Over the next 20 years, we expect 70 percent of Portland's growth to occur in the Central City and along major transit lines. We have also adopted ambitious transportation planning goals to reduce greenhouse gas emissions, cut vehicle miles travelled, and double the share of commuters who use transit – to 25 percent by 2035. Full build-out of the regional light rail system is a critical element of our land use plans and Climate Action goals. The Southwest Corridor is the last major spoke in this regional system. Development of high-capacity transit in a dedicated right of way in this corridor helps to advance many of the City's goals.

We have reviewed the Draft Environmental Impact Statement (DEIS) and Initial Route Proposal (IRP) for the SW Corridor project, and respectfully offer the following comments.

We generally agree that the IRP meets the project purpose but have significant reservations about elements of the DEIS. While the Southwest Corridor is evaluated as a transportation project, we believe it is fundamentally a tool to shape and manage growth. The PSC was deeply involved in laying the groundwork for this project through our consideration of the Barbur Concept Plan (BCP), adopted by the City in 2013. The IRP in part honors that plan, which emphasized the land use, growth management, and place-making opportunities that should drive the project alignment.



City of Portland, Oregon | Bureau of Planning and Sustainability | www.portlandoregon.gov/bps
1900 SW 4th Avenue, Suite 7100, Portland, OR 97201 | phone: 503-823-7700 | fax: 503-823-7800 | tty: 503-823-6868

Printed on 100% post-consumer waste recycled paper.

We appreciate these project elements:

- The through-route alignment serving downtown Tigard.
- Shuttle service and strong pedestrian and bike connections to the PCC Sylvania campus.
- The in-Barbur alignment north of the Crossroads.
- The shared transitway to facilitate more reliable bus service in Southwest Portland.
- The inclusion of important pedestrian and bike improvements for station access.
- A strong connection to Marquam Hill.

Environmental Justice Concerns

Social justice and equity are at the core of the Commission’s Comprehensive Planning and Climate Action Plan roles. With this context in mind, we are disappointed in the DEIS Environmental Justice analysis, and the lack of attention to housing stability in the indirect and cumulative effects analysis. Given the resources that the cities of Tigard and Portland have put into studying housing needs in the corridor, and the potential for displacement, the DEIS analysis of this topic is insufficient and superficial. As written, the analysis is narrowly focused on direct displacement. This analysis needs to be broadened to consider displacement caused by the expected real estate activity and property value changes that will come because of a major light rail investment. Although light rail is not the sole cause of gentrification and displacement, it is well established that major light rail investment will impact property values and rents in a corridor, and therefore, it is an impact that must be analyzed and mitigated.

Past transit investments in Portland have contributed to the displacement of low-income households and communities of color. Therefore, we have recommended the Portland City Council plan for housing and transit together. Given that history, we are especially concerned with displacement pressure from rising housing costs and the impact of that pressure on immigrants and communities of color now living in apartments in West Portland near the Barbur Transit Center, and near Downtown Tigard. Residential displacement could also negatively impact important community institutions, such as the Islamic Center of Portland.

Through the Southwest Corridor Equitable Housing Strategy (SWEHS) the cities of Portland and Tigard have quantified the number of residents vulnerable to displacement pressures and the number of unregulated but still affordable housing units that could be susceptible to rent increases in the corridor. The SWEHS also includes information about where those risks overlap with communities of color. The data collected by Tigard and Portland should be further analyzed and the final EIS should evaluate appropriate mitigation actions that can be incorporated into the project, many of which have already been identified in the SWEHS.

It is essential that the transit project and the housing strategy are funded and implemented in tandem. One cannot be done without the other. We appreciate that TriMet has engaged with other project partners to discuss a Memorandum of Understanding to dedicate and discount TriMet-owned land to support the feasibility of affordable housing development. The project will be stronger with a robust support of the housing strategy because ridership will decline if core riders are displaced and cannot access the benefits of low-cost transit service or new services and amenities that come with the development of the corridor.

Transportation Concerns

In addition, we are concerned about the scope of transportation impact analysis in the DEIS. While we appreciate that the analysis addresses active transportation, the framework of the technical study is extremely vehicle-centered. This approach is contrary to the adopted policies in Portland’s Transportation



City of Portland, Oregon | Bureau of Planning and Sustainability | www.portlandoregon.gov/bps
1900 SW 4th Avenue, Suite 7100, Portland, OR 97201 | phone: 503-823-7700 | fax: 503-823-7800 | tty: 503-823-6868

Printed on 100% post-consumer waste recycled paper.

System Plan (TSP). Portland's TSP prioritizes modes of people movement in the following order: walking, bicycling, transit, taxi/commercial transit/shared vehicles, zero emission vehicles; and other single occupancy vehicles at the lowest priority.

Most mitigations itemized in the DEIS are aimed at maintaining vehicle movement rather than people movement. While it is helpful that the DEIS identifies the potential impact of vehicle-related mitigation on active transportation modes (Table 3.3-1 for example), the emphasis is on maintaining or expanding vehicle roadway capacity. This is backwards. The transportation analysis should be about how people move through the corridor. The mitigation list should include actions that better manage demand, more efficiently allocate the existing road capacity, or encourage other modes.

One specific active transportation concern is how the project could disrupt or improve bicycle network connectivity in the corridor. The project will be more successful if there is a complete network of active transportation options throughout the corridor. The project has an opportunity to think more broadly about how to make all alternatives to driving safer and more convenient. In particular, the alignment options at the West Portland crossroads, and at the historic viaducts need to be evaluated with this lens. More public discussion is needed in both locations.

A related concern is the location and size of park and ride lots in places where local land use plans emphasize pedestrian access and walkability. We urge you to look carefully at the relationship between park and rides and planned land uses. In the West Portland Town Center, the vehicle traffic generated by the Barbur Transit Center park and ride facility undermines the land use vision for a Town Center – that it become a walkable human-scale community.

Finally, we would like to note our strong support for reconfiguring the Ross Island Bridgehead to re-establish an urban street pattern. That project facilitates significant redevelopment close to the Gibbs station, which supports transit ridership and regional growth management goals. As described in the DEIS, the Bridgehead reconstruction also improves traffic outcomes at this regionally-significant bottleneck. We do not support reconstruction of the Bridgehead as a limited access facility – that alternative is directly at odds with thirty years of land use plans for that area.

We the opportunity to comment on the DEIS and IRP for the SW Corridor project. As stewards of the Portland Comprehensive Plan and Climate Action Plan, we will remain engaged as planning progresses, and as designs are refined.

Sincerely,



Katherine Schultz
Chair



City of Portland, Oregon | Bureau of Planning and Sustainability | www.portlandoregon.gov/bps
1900 SW 4th Avenue, Suite 7100, Portland, OR 97201 | phone: 503-823-7700 | fax: 503-823-7800 | tty: 503-823-6868

Printed on 100% post-consumer waste recycled paper

O27: Restore Oregon

From: [Chris Ford](#)
To: [swcorridordeis](#)
Subject: FW: Draft EIS for SW Corridor Light Rail Project now available online
Date: Tuesday, June 19, 2018 10:33:13 PM

Comment on the DEIS

Chris Ford
Investment Areas Project Manager
Metro | Making a great place
503-797-1633
chris.ford@oregonmetro.gov

From: Peggy Moretti [REDACTED]
Sent: Monday, June 18, 2018 4:23 PM
To: Chris Ford
Cc: Mark.Assam@dot.gov; unswordt@trimet.org; Katelyn Weber
Subject: Fwd: Draft EIS for SW Corridor Light Rail Project now available online

Hi Chris - Thank you for the opportunity to respond. This is an important project in the region!

Restore Oregon supports the route recommendations of AINW, trusting their thorough analysis. However, we find their recommendations for mitigation for the adverse effects on historic resources to be entirely insufficient. Documentation and signage do little to make up for the loss or harm to so many resources.

Restore Oregon urges that mitigation for the adverse impact on historic resources consist of providing funds for the restoration or seismic retrofitting of other historic structures and sites in the Region. These funds could take the form of matching grants (applicant must match the grant dollar-for-dollar) administered by SHPO or an organization like Restore Oregon. We have served as a fiscal sponsor in the past and are currently negotiating another mitigation agreement that would include administration of grant funds for preservation.

We would be happy to discuss this further at the appropriate time. Thank you!

Peggy Moretti
Executive Director



On Tue, Jun 12, 2018 at 12:43 PM, Peggy Moretti <[REDACTED]> wrote:

Begin forwarded message:

From: "Chris Ford" <Chris.Ford@oregonmetro.gov>
Date: June 7, 2018 at 3:39:12 PM PDT
To: "Peggy Moretti" <[REDACTED]>
Cc: "Assam, Mark (FTA)" <Mark.Assam@dot.gov>, "Dave Unsworth" <unsworld@trimet.org>
Subject: Draft EIS for SW Corridor Light Rail Project now available online

Your organization agreed to participate in the Section 106 process for the proposed SW Corridor Light Rail Project, located in Multnomah and Washington Counties, Oregon. The Draft Environmental Impact Statement (EIS) for the project is now available online here: <http://www.swcorridorplan.org/lightrail>

A Notice of Availability for the Draft EIS will be published in the Federal Register on June 15, 2018 commencing the 45-day public review period which concludes on July 30, 2018. A public hearing on the Draft EIS will be held at 6 PM on July 19, 2018 at Tigard Town Hall, 13125 SW Hall Boulevard, Tigard, OR 97223, to provide an opportunity for oral comments on the project.

Please provide any comments on the Draft EIS by Monday, July 30, 2018. Comments can be emailed to swcorridordeis@oregonmetro.gov or mailed to SW Corridor, Metro, 600 NE Grand Avenue, Portland, OR 97232. Input received on the Draft EIS will be taken into consideration for the selection of the Preferred Alternative (final rail alignment) later in 2018. Responses to substantive comments on the Draft EIS will be provided in the Final EIS, to be released in late 2019.

Helpful comments on the Draft EIS include:

- support or opposition to the initial route proposal, including reasons
- identification of missing information or errors
- different conclusions from the analysis presented
- mitigation measures to address impacts in addition to those proposed

Next steps for the Section 106 consultation process will be shared after the Draft EIS review period.

Feel free to contact me or Mark Assam at the Federal Transit Administration (mark.assam@dot.gov) with any questions. I am happy to provide your organization with a briefing on the Draft EIS or the proposed project.

Sincerely,

Chris Ford
Investment Areas Project Manager

Planning and Development

Metro | Making a great place
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1633
chris.ford@oregonmetro.gov

Stay informed on the [Southwest Corridor Plan](#)

O28: South Portland Neighborhood Association

Email:

From: [Eryn Kehe](#)
To: [swcorridordeis](#)
Subject: FW: SPNA - SW Corridor Position
Date: Wednesday, July 25, 2018 4:44:47 PM
Attachments: [SW Corridor Letter.pdf](#)

From: Mike Dane [REDACTED]
Sent: Wednesday, July 25, 2018 2:46 PM
To: Pearce, Art; Kerry Chipman; Harrison, Michael; 'Marilynn Considine'; [REDACTED]; 'James Gardner'; Eryn Kehe; 'Koozer, Jennifer'; 'Pascuzzi, Pasquale'; Mike Dane; Ref, Caitlin; Matt Binn; 'Unsworth, David'; 'Martin, Brenda'; Caryanne Conner
Subject: FW: SPNA - SW Corridor Position

This email group should have all names CC'd in attached letter.

From: SPNA1617 [REDACTED]
Sent: Wednesday, July 25, 2018 14:42
To: Mike Dane <[REDACTED]>
Cc: Chipman, Kerry <[REDACTED]>; [REDACTED]; Conner, Caryanne <[REDACTED]>; Considine, Marilynn <[REDACTED]>; Gardner, Jim <[REDACTED]>; Harrison, Michael <[REDACTED]>; Pascuzzi, Pasquale <[REDACTED]>
Subject: Re: SPNA - SW Corridor Position

Mike & rest of Ad Hoc committee,
I never received the requested email addresses, therefore, I have attached the signed letter for someone on the committee to send it to the proper authorities. No paper copy has been sent.
Len

From: "SPNA1617" <[REDACTED]>
To: "Mike Dane" <[REDACTED]>
Cc: [REDACTED]
Sent: Saturday, July 14, 2018 8:02:03 PM
Subject: Re: SPNA - SW Corridor Position

Mike,
I cannot do anything with this draft. You need to provide me with specific email addresses for each recipient, including the Steering Committee.
I am leaving Monday morning for 10+ days trip and will be unable to work on this until after I return.
Len

From: "Mike Dane" <[REDACTED]>
To: [REDACTED]
Sent: Friday, July 13, 2018 8:41:35 AM
Subject: SPNA - SW Corridor Position

Hi Len,

Please see attached. Feel free to edit as you see fit.

Regards,
Mike

Mike Dane, AICP | Senior Airport Planner

[REDACTED]
[REDACTED] | www.centurywest.com





South Portland Neighborhood Association

7688 SW Capitol Highway, Portland, OR 97219 (503) 823-4592
www.southportlandna.org

July 25, 2018

Southwest Corridor Steering Committee

RE: Preferred SW Corridor Alignment

Dear Committee Members,

The South Portland Neighborhood Association (SPNA) supports implementation of the basic elements of the Ross Island Bridgehead project. These infrastructure improvements would reconnect the Lair Hill/Corbett areas of South Portland and reduce the impacts of high volumes of vehicle traffic on the livability of the neighborhood.

SPNA supports the inclusion of funding for the Ross Island Bridgehead project as an integral part of Metro's 2020 regional funding measure for SW Corridor LRT and other transportation projects in the region. This funding measure represents the best opportunity to complete the Bridgehead project in conjunction with construction of SW Corridor LRT.

If Ross Island Bridgehead project funding is included in the 2020 regional measure, SPNA supports the Barbur Alignment (Option A1) as the route for future LRT through the Lair Hill neighborhood. The SPNA Board elects to support the Barbur alignment at this time and to focus our future efforts and energy on working with the City of Portland and other regional partners to secure passage of the 2020 funding measure.

Sincerely,

A handwritten signature in black ink, appearing to read 'G. L. Michon, Jr.'.

G. L. Michon, Jr.

Chairman, South Portland Neighborhood Association

CC:

**Art Pearce
Teresa Boyle
David Unsworth
Eryn Kehe
Matt Bihn**

Your South Portland Neighborhood Association: working together for a safe, welcoming, and vibrant community

O29: Southwest Neighborhoods, Inc.

Email:

From: [Sylvia Bogert](#)
To: [swcorridordeis](#)
Cc: [Bob Stacey](#); [Commissioner Dan Saltzman](#); [Chris Ford](#); [Eryn Kehe](#); [Leslie Hammond](#); [John Gibbon](#); [David Martin](#)
Subject: SWNI Southwest Corridor Plan DEIS Comments
Date: Monday, July 30, 2018 12:21:41 PM
Attachments: [SWNI Southwest Corridor DEIS 7-30-18.pdf](#)
[ATT00001.htm](#)

Dear Members of the Southwest Corridor Plan Steering Committee:

Southwest Neighborhoods, Inc. (SWNI) supports the purposes and goals for the Southwest Corridor Light Rail Project. The coalition is pleased to submit the attached letter with comments and concerns regarding the initial route proposal described in the June 2018, Southwest Corridor Plan Draft Environmental Impact Statement (DEIS). The SWNI coalition members consist of 17 member neighborhood associations and comments in the letter reflect the consensus of our committee members and Board of Directors, based on committee motions approved by the SWNI Board on July 25, 2018.

Thank you for considering these comments in your selection of the Locally Preferred Alternative and in the next phase of studies and project development.

Sincerely,

Leslie Hammond
President
Southwest Neighborhoods, Inc.

Sylvia Bogert
Executive Director
Southwest Neighborhoods, Inc.



Attachment:



Southwest Neighborhoods, Inc.
7688 SW Capitol Highway, Portland, OR 97219 (503) 825-4592
www.swni.org

July 30, 2018

Southwest Corridor Plan Steering Committee
Metro
600 NE Grand Avenue
Portland, OR 97232

Re: **Southwest Corridor Plan DEIS**

Dear Members of the Southwest Corridor Plan Steering Committee:

Southwest Neighborhoods, Inc. (SWNI) supports the purposes and goals for the Southwest Corridor Light Rail Project. The coalition is pleased to submit the following comments and concerns regarding the initial route proposal described in the June 2018, Southwest Corridor Plan Draft Environmental Impact Statement (DEIS). The SWNI coalition members consist of 17 member neighborhood associations and these comments reflect the consensus of our committee members and Board of Directors, based on committee motions approved by the SWNI Board on July 25, 2018.

Invest in the Ross Island Bridgehead, regardless of the route:

SWNI believes that the Ross Island Bridgehead Improvements Project should be included for funding as part of Metro's 2020 regional funding measure and constructed parallel with construction of the SW Corridor LRT Project. The Bridgehead Project should not be part of the SW Corridor LRT application for federal funding.

The DEIS traffic analysis demonstrates that a Barbur LRT alignment plus Ross Island Bridgehead Improvements provide the best overall transportation network performance.

A regional commitment has been expressed to pursue constructing improvements to the Ross Island Bridgehead and Naito Parkway parallel with construction of the SW Corridor LRT project.

Refinement 1 (pages E-3 - E-5), Barbur Woods East-Side Running:

SWNI supports the Refinement 1 Alternative, which includes 2 new light rail bridges over the Vermont and Newbury gullies including bicycle and pedestrian facilities connecting the urban trails west and north as well as adding 2 vehicle lanes.

Specifically, the following comments need to be considered:

- The existing bridges will be very difficult to replace while at the same time maintaining 2 lanes of traffic due to the modular design of the bridges and the unstable conditions removing half of the structure will likely create.

- Contractors may find it difficult or impossible to secure liability insurance for the construction project with traffic continuing to pass over the structurally challenged bridges, which are about 100 feet above the valley floor.
- Adding two vehicle lanes to the Light Rail Bridge to be used for northbound Barbur Traffic will provide a safe one-lane each direction detour for traffic at such time as the two bridges are replaced.
- The cost of replacing the two bridges will be much lower if traffic is taken off the bridges entirely.
- Two vehicle lanes on a bridge designed to withstand severe earthquake stresses will provide vehicle passage after a major earthquake which may disable the existing wooden bridges.
- If it is not feasible to replace the bridges while maintaining two lanes of traffic, shutting down Barbur will have a huge impact on SW Portland traffic.
- According to the DEIS the rebuilding of the Capitol Highway flyover at Barbur will close Capitol Hwy eastbound from Terwilliger for 2 years. This closure will have a large impact on the Hillsdale Business Community.
- The Urban Trail route from Hillsdale to the Hooley Bridge is planned to cross the Newbury (Iowa) gully. It is important that the connections both west to Hillsdale through Himes Park and Parkhill Drive be provided as planned.

Refinement 2 Taylors Ferry I-5 Overcrossing:

SWNI **does not** support the Refinement 2 alternative alignment because of the following concerns:

1. **This option adversely impacts the environmental zone;**
2. **Stormwater needs to be mitigated;**
3. **This option adversely impacts Woods Creek and Woods Park;**
4. **Pedestrian and bicycle access have not been adequately addressed or studied; and**
5. **Traffic impacts have not been sufficiently studied**

Any iteration of Refinement 2 will adversely impact the property lying south of Taylor's Ferry Road that is subject to a City of Portland environmental zone overlay that protects the first portion of upper Woods Creek that flows in its natural channel.

Likewise SWNI's board strongly believes that any iteration of Refinement 2 will cause unacceptable environmental impacts such as noise, vibration and light, which will be highly damaging to the character and purpose of Woods Memorial Park, a City of Portland Nature Park, which is located immediately adjacent to the north side of Taylor's Ferry Road.

SWNI's board is also seriously concerned that Refinement 2 is even being considered without any evidence of what the proposal's impact would be on the volume and quality of storm water that flows through Woods Creek. Refinement 2 would impact private and public properties including additional City of Portland and TVPRD parks before its confluence with Fanno Creek near the Portland Golf Club and the Oregon Episcopal School in Beaverton. The SWNI board cannot see how, given the substantial and challenging natural character of the area, that such a

proposal can be considered without at least evaluating these effects and discussing their mitigation.

Specifically, Refinement 2 does not include any bicycle or pedestrian facilities. The proposed traffic mitigation is to add room for motor vehicles but **not** for pedestrian and bicycle facilities. This would make it less safe for people to walk and bike to the Barbur Transit Center and transit service, shops and services in West Portland Crossroads.

Specifically, Refinement 2 assumes "additional storage lanes would be added on SW Taylors Ferry Road and SW Capitol Highway to mitigate traffic impacts from light rail operations (e.g. added wait time at rail crossing gates)", but the refinement doesn't specify adding room for bicyclists and pedestrians as well as motor vehicles

If Refinement 2 is pursued, then SWNI insists on the addition of **Project SA-16**, Taylor's Ferry sidewalk and bikeways, in the Locally Preferred Alternative, in order for pedestrians and bicyclists to access the Barbur Transit Center. In addition to adding bicycle and pedestrian facilities on the I-5 overcrossing it will make it safer to walk and bike though the crossroads and access the stations at Barbur Transit Center and SW 53rd.

Refinement 4 (pages E-12 - E-14), Barbur Undercrossing:

SWNI supports Refinement 4, which shifts the Tigard Triangle station and park and ride to SW 68th Parkway just south of Pacific Highway, **with the condition**, that bicycle and pedestrian facilities are added to access the station.

Specifically, there are significant gaps in the bicycle and pedestrian network on Barbur from SW 60th to SW 68th that need to be addressed in the design; we need to better understand how this newly proposed alignment will be constructed and ensure better walking and bicycling conditions on Barbur to access the station

Thank you for considering these comments in your selection of the Locally Preferred Alternative and in the next phase of studies and project development.

Sincerely,



Leslie Hammond
President
Southwest Neighborhoods, Inc.

cc: Southwest Corridor Citizens Advisory Committee
Bob Stacy, Metro Council District 6
Commissioner Dan Saltzman, City of Portland
Chris Ford, Metro
Eryn Kehe, Metro

O30: SW Trails PDX

From: [Douglas Rogers](#)
To: [swcorridor@eis](#)
Subject: Southwest Corridor Plan testimony for SW Trails PDX
Date: Monday, July 30, 2018 12:28:19 AM

SW Corridor Plan Steering Committee:

For over 20 years SW Trails PDX volunteers have helped enhance the walking experience in SW Portland. As an all-volunteer non-profit community organization we have mapped, signed, and built connections to expand the walking opportunities within our SW community. We have been following the progress of the SW Corridor Plan closely and must express our concerns for recent design decisions.

SW Trails can only support SW Corridor Light Rail alignments or refinements which improve pedestrian and bicycle mobility throughout our region. Three design refinements in the Initial Route Proposal cause concern to us, because they appear to create gaps by removing the pedestrian and bicycle facilities present in earlier alignment options studied in the Draft Environmental Impact Statement. In particular, we refer to design refinements for the Barbur Blvd. viaduct bypass, the Taylors Ferry modification, and the proposed tunnel under Barbur (refinements #1, #2, and #4).

Please also note that the Red Electric Trail -- the long planned Regional Trail for pedestrians and bikes from downtown and on to Washington County -- is planned to cross Barbur Blvd. at the Newbury Bridge (from SW Slavin Road over to Himes Park). So this trail crossing also needs to be incorporated into your design planning.

We encourage the Steering Committee to restore pedestrian and bicycle facilities should it choose any of these design refinements. Specifically, we strongly recommend adding a multi-modal path to each of the proposed structures in the design refinements. Restoring pedestrian and bicycle features, thus ensuring the safe flow of pedestrians and bicyclists throughout the Corridor, would allow us to support these design refinements. Otherwise, we must oppose them.

Ideally, one should be able to safely ride light rail, walk, or ride a bicycle along any and all of the SW Corridor rail line, from downtown Portland to Bridgeport Village. Thank you for your consideration.

Sincerely,

Doug Rogers, President, SW Trails PDX


1 Faster travel time, most cost effective to
2 operate, lower capital costs, most comprehensive
3 multi-modal transportation plan with the Tigard-
4 Tualatin connectivity, and the best route to support
5 the Tigard triangle strategic plan most accessible
6 to the residents of Tigard. We feel it displaces
7 fewer businesses and employees, and provides for a
8 significant economic development. It also maintains
9 projected ridership as anticipated. Our support is
10 in alignment with Metro, TriMet, and other
11 jurisdictional planning staff and engineers for this
12 important project for the region.

13 On behalf of the Portland Clinic and
14 coalition members, I request that the Committee
15 support the IRP to DEIS findings and making the IRP
16 the preferred alternative in August, moving this
17 work from the final EIS and the regional transit
18 plan. Thank you.

19 **COUNCILOR DIRKSEN:** Thank you.

20 The next up is Debi Mollahan, and she will
21 be followed by Steve Deangelo.

22 **MS. MOLLAHAN:** Good evening, I'm Debi
23 Mollahan, I'm CEO of the Tigard Chamber, and I'm
24 here on behalf of our member businesses, the larger
25 business community.

1 I would like to speak in support of the
2 southwest corridor light rail overall. We've been
3 actively engaged with this project for the three or
4 four years through participation of various metro
5 committees. And particularly in the last 18 months,
6 as I've been a member of Southwest Corridor Light
7 Rail Community Advisory Committee, also known as
8 CAC, as well as working on local ballot initiatives
9 to support this in Tigard.

10 Since I'm on the CAC, I will not comment
11 directly on the IRP, since our committee will be
12 recommending a locally preferred alternative to the
13 Steering Committee shortly.

14 While the implementation of light rail
15 into and through Tigard will not reduce our current
16 congestion, it will help mitigate future congestion
17 modeled into 2035. Without implementation of
18 alternative transit options, congestion is modeled
19 to change from more kind of normal work hours, two
20 to three hours in the morning and evening, to
21 congestion 13 to 17 hours per day. That was
22 startling to me. So doing nothing is really not an
23 option, and based on years of study, this project
24 seems like the best option. I get constant feedback
25 from residents and business about increased

NAEGELI
DEPOSITION AND TRIAL



(800)528-3335
NAEGELIUSA.COM

1 commuting times, increased traffic, congestion and
2 more, which affects quality of life. It impacts our
3 businesses' bottom line and service delivery.

4 It is disheartening that a transportation
5 project of this size will impact residential and
6 commercial business properties. Any large
7 transportation improvement, whether it's light rail,
8 dedicated bus lanes, or new road construction,
9 unfortunately, will have this impact due to our
10 density and build-up.

11 As a member of Southwest Corridor CAC,
12 I've gotten feedback from both business and property
13 owners. I've met with many, and I've directed them
14 to appropriate contacts at Metro. In the process,
15 I've been pleased in the responsiveness and concern
16 that I've seen by Metro and TriMet. Even as the
17 DEIS was being developed, they began work
18 mitigations to reduce impact where possible. This
19 has resulted in the proposed design modifications,
20 which are currently part of the IRP. And I realize
21 those design modifications haven't had the same
22 level of study, so there may be things that get
23 unearthed, as you just noted, with the change in the
24 station.

25 However, we like the proposed design

NAEGELI
DEPOSITION AND TRIAL



(800)528-3335
NAEGELIUSA.COM

1 modifications at a high level, given what we know at
2 this point in time, as they appear to reduce the
3 overall impact to business as well as naturally
4 occurring low-income housing, which is a concern for
5 Tigard, while improving transit times and resident
6 access. A shift of that station up on 68th moves it
7 closer to residents on the other side of 99W.

8 I would encourage both TriMet and Metro to
9 continue to listen to impacted property owners,
10 businesses, and residents, and where possible,
11 continue to modify design.

12 High capacity transit in Tigard and the
13 south metro are vital to managing the future growth
14 that's projected. Multiple modes of transportation
15 are important to commerce and a healthy society.
16 This project is both critical to Tigard and the
17 region to manage our growth and provide our
18 employers, employees, and residents with transit
19 options. Thank you for your time.

20 COUNCILOR DIRKSEN: Thank you.

21 Next is Steve Deangelo followed by Carol
22 Krager.

23 MR. DEANGELO: Good evening. My name is
24 Steve Deangelo. I'm a downtown business owner. I'm
25 a commercial property owner. I've been a resident

NAEGELI
DEPOSITION AND TRIAL



(800)528-3335
NAEGELIUSA.COM

O32: Tigard Town Center Advisory Commission

Email:

From: [Kate Rogers](#)
To: [swcorridordeis](#); [Sean Farrelly](#); [Carine Arendes](#); [Gloria Pinzon Marin](#); [Tim Myshak](#); [Tim Myshak](#); [REDACTED]; [Joe Patton](#); [REDACTED];
Subject: Comments from Tigard Town Center Advisory Commission
Date: Thursday, July 26, 2018 3:07:37 PM
Attachments: [SW Corridor Recommendation V4.docx](#)

Town Center Advisory Commission Recommendations on SW Corridor Alignments

Note: The following recommendations have been prepared regarding the SW Corridor Project Draft Environmental Impact Statement by Tigard's Town Center Advisory Committee (TCAC). The TCAC is an advisory citizen committee charged with advising the Tigard City Council and Board of the Town Center Development Agency on policy related to the City of Tigard's urban renewal areas. Tigard's urban renewal areas are colloquially known as Tigard Downtown and the Tigard Triangle. Comments are limited to those portions of the SW Corridor light rail project that are located within the urban renewal areas or will have a significant impact on those areas.

Key Considerations:

The most important consideration for the TCAC is a light rail alignment that will serve the City of Tigard including the provision of sufficient station locations to serve an expanding population base. Another key factor in our recommendations is the preservation of naturally occurring affordable housing. The TCAC has had project briefings by Metro and Tri-Met staff, studied the DEIS, heard feedback from our liaison to the SW Corridor Community Advisory Committee (SWC CAC), and received input from city staff and city council liaison. These perspectives informed our discussion and this recommendation.

Segment C Preferences:

Line Configuration

The DEIS studied six route proposals through the Tigard area. The TCAC strongly prefers a through route rather than a branched route. This option ensures regular and frequent service to the Tigard transit center providing access to the area near the transit center and connectivity to areas to the south and west not served by the SW Corridor light rail.

Route into Downtown

Ash and Clinton alignments provide access into the downtown area west of I-5 and Highway 217. The TCAC prefers the Ash alignment to the Clinton alignment based on cost and travel time considerations as well as environmental impacts.

We strongly urge the Steering Committee to consider the potential for incubating locally owned businesses, developing small retail and services business for commuters, structured parking, and redevelopment opportunities. Another key consideration is the possibility to use property remnants for affordable housing.

The TCAC prefers the Elmhurst alignment due to the original alignment's impacts on the existing roadway and businesses along SW Beveland Road. The TCAC is supportive of further exploration into the 68th Parkway Refinement that promotes better station spacing in the Triangle with the caveat that surface parking is not appropriate at this location, while structured parking is highly desirable.

Station Placement

Tigard Triangle Station Locations

The TCAC supports a Locally Preferred Alternative that results in two stations in the Triangle; given the size and area of the Tigard Triangle the provision of two stations is necessary.

Downtown Tigard Station Recommendation:

TCAC strongly considered a station located on or near Main St as shown in the original alignments studied for the DEIS. However, concerns were raised about crossing Hall Blvd at two locations and the traffic implications of closing the street upward of 300+ times per day were considered too onerous to support. Also, the probable route towards Main St. would result in the destruction of a substantial quantity of naturally occurring affordable housing, which the TCAC opposes.

The TCAC instead prefers a station on the east side of Hall Blvd immediately adjacent to the street frontage to minimize walking time and distance to Main Street. Our preference is based on the understanding that all parties involved will work toward creating a station to serve downtown Tigard that takes into consideration good urban design based on the principles of transit-oriented development, affordable housing, walkability, safety, equitable business development, and a vibrant connection to Main St.

Refinement Considerations: We support further study of Refinement #6 and strongly prefer the proposed station immediately adjacent to Hall Blvd as it better serves downtown Tigard. Such study should address concerns about the cost and the impact a proposed flyover would have on the look and feel of downtown Tigard.

Town Center Advisory Commission Recommendations on SW Corridor Alignments

Note: The following recommendations have been prepared regarding the SW Corridor Project Draft Environmental Impact Statement by Tigard's Town Center Advisory Committee (TCAC). The TCAC is an advisory citizen committee charged with advising the Tigard City Council and Board of the Town Center Development Agency on policy related to the City of Tigard's urban renewal areas. Tigard's urban renewal areas are colloquially known as Tigard Downtown and the Tigard Triangle. Comments are limited to those portions of the SW Corridor light rail project that are located within the urban renewal areas or will have a significant impact on those areas.

Key Considerations:

The most important consideration for the TCAC is a light rail alignment that will serve the City of Tigard including the provision of sufficient station locations to serve an expanding population base. Another key factor in our recommendations is the preservation of naturally occurring affordable housing. The TCAC has had project briefings by Metro and Tri-Met staff, studied the DEIS, heard feedback from our liaison to the SW Corridor Community Advisory Committee (SWC CAC), and received input from city staff and city council liaison. These perspectives informed our discussion and this recommendation.

Segment C Preferences:

Line Configuration

The DEIS studied six route proposals through the Tigard area. The TCAC strongly prefers a through route rather than a branched route. This option ensures regular and frequent service to the Tigard transit center providing access to the area near the transit center and connectivity to areas to the south and west not served by the SW Corridor light rail.

Route into Downtown

Ash and Clinton alignments provide access into the downtown area west of I-5 and Highway 217. The TCAC prefers the Ash alignment to the Clinton alignment based on cost and travel time considerations as well as environmental impacts.

We strongly urge the Steering Committee to consider the potential for incubating locally owned businesses, developing small retail and services business for commuters, structured parking, and redevelopment opportunities. Another key consideration is the possibility to use property remnants for affordable housing.

The TCAC prefers the Elmhurst alignment due to the original alignment's impacts on the existing roadway and businesses along SW Beveland Road. The TCAC is supportive of

further exploration into the 68th Parkway Refinement that promotes better station spacing in the Triangle with the caveat that surface parking is not appropriate at this location, while structured parking is highly desirable.

Station Placement

Tigard Triangle Station Locations

The TCAC supports a Locally Preferred Alternative that results in two stations in the Triangle; given the size and area of the Tigard Triangle the provision of two stations is necessary.

Downtown Tigard Station Recommendation:

TCAC strongly considered a station located on or near Main St as shown in the original alignments studied for the DEIS. However, concerns were raised about crossing Hall Blvd at two locations and the traffic implications of closing the street upward of 300+ times per day were considered too onerous to support. Also, the probable route towards Main St. would result in the destruction of a substantial quantity of naturally occurring affordable housing, which the TCAC opposes.

The TCAC instead prefers a station on the east side of Hall Blvd immediately adjacent to the street frontage to minimize walking time and distance to Main Street. Our preference is based on the understanding that all parties involved will work toward creating a station to serve downtown Tigard that takes into consideration good urban design based on the principles of transit-oriented development, affordable housing, walkability, safety, equitable business development, and a vibrant connection to Main St.

Refinement Considerations: We support further study of Refinement #6 and strongly prefer the proposed station immediately adjacent to Hall Blvd as it better serves downtown Tigard. Such study should address concerns about the cost and the impact a proposed flyover would have on the look and feel of downtown Tigard.

O33: Tigard Town Center Advisory Commission

Text submitted using online comment form:

Based on Metro staff comments in the July 30th SWC CAC meeting, the attached document prepared by the City of Tigard appointee to the SWC CAC to be prepared to contribute to the SWC CAC discussion is submitted for your consideration.

Locally Preferred Alternative Worksheet

Modified for TCAC use to provide feedback to the SW Corridor Community Advisory Committee (SWC CAC) appointee

[Note: numbering based on Metro provided document previously shared with the TCAC]

Prepared by Carine Arendes, City of Tigard Town Center Advisory Commissioner/SWC CAC appointee

Revised: 7/16/2018 subsequent to July 12 TCAC meeting

1. From the available options studied in the Draft Environmental Impact Statement, does the group recommend? (Pick one in each category)
- c. Ash to I-5 Through (C1), Ash to RR Through (C2), Clinton to I-5 Through (C3), Clinton to RR Through (C4), Ash and I-5 Branched (C5), or Wall and I-5 Branched (C6)?

Through – strongly preferred

The I-5 or railroad alignment choice is located outside the scope of the TCAC geographically constrained purview. Since there is little to no support or interest amongst the SW CAC to reexamine impacts associated with RR alignment in light of the Hunzinker alignment proposed in the IRP, the TCAC reviewed the remaining alternatives:

- Ash to RR Through (C2)
- Clinton to RR Through (C4)

TCAC prefers Ash to Clinton

The environmental and cost differences between the Ash and Clinton alignments make the Ash alignment strongly preferred by Tigard staff; TCAC continues to support with this rationale.

2. Does the group support continued exploration of the following design refinements/modifications? Why or why not?

- c. 99W undercrossing Yes/No

Why?

- Reduction in travel times
- Reduction costs
- Preferred station spacing
- Opportunity for retail and other active uses at station

- d. Elmhurst in Triangle Yes/No

Why?

- Reduction in travel times
- Reduce impacts to existing businesses in the Triangle on Beveland Street
- Less property acquisitions will likely reduce costs marginally
- Preserve existing investment in high quality local roads

- e. Hall station downtown Yes/No

Why?

- Reduce travel times
- Reduce costs
- Reduce impacts on SW Hall Blvd caused by excessive crossings
- Avoids impacts to existing downtown businesses

- Avoids disruption or cleavage of the downtown area that may arise from light rail bisecting the revitalized downtown area
- Minimizes impacts to wetlands (from Clinton alignment)
- Provides bike/ped connection to Triangle

3. Are there considerations for these choices that the CAC hopes the Steering Committee will consider?

c. 99W undercrossing

- No surface parking- keep any parking structured
- Economic Development Opportunities
- Supportive of the HWY 99 business corridor
- Provision of small scale uses geared to users of the transit system
- Encourage locally owned businesses
- Opportunity for business incubator
- Preference for alignment that results in usable remnant properties along HWY 99 rather than I-5

d. Elmhurst in Triangle

- Avoid impacts to existing infrastructure investments
- Smoother (straighter) alignment is recognized as shorter and faster

e. Hall station downtown

- TCAC supports a Hall Street alignment immediately adjacent to Hall street that minimizes walking time & distance to Main Street and creates a sense of arrival in downtown
- Pedestrian access and safety for Hall Street crossing
- Potential interest in flyover tempered by concerns about interruption in the urban fabric and oppressive sense of closure
- Urban design considerations, such as providing a sense of connection between Main Street & the station must be prioritized
- Realignment/improvements to Scoffins/Hunzinker intersection
- Potential for redevelopment, including Public Works consolidation in the Hunzinker area

1 city, not the light rail -- is widen Hunziker at the
2 intersection and install a left turn refuge lane so
3 people can then get out without having to worry
4 about eastbound traffic hitting them.

5 Thank you.

6 MS. KEHE: Thank you. Thank you. Kate
7 Rogers, followed by Jerry Parker.

8 MS. ROGERS: Hello, I'm Kate Rogers, and
9 I'm here representing the TCAC. The following
10 recommendations have been prepared regarding the
11 Southwest Corridor Project Environmental Impact
12 Statement by Tigard's Town Center Advisory
13 Commission, the TCAC. We are an advisory citizen
14 commission charged with advising the City of Tigard
15 and the board of the Town Center Development Agency
16 on policy related to the City of Tigard urban
17 renewal districts.

18 Tigard's urban renewal districts are
19 colloquially known as downtown Tigard and the Tigard
20 triangle. Comments are limited to those portions of
21 the Southwest Corridor Light Rail Project that are
22 located within the urban renewal areas or will have
23 significant impact on these areas.

24 The most important consideration for the
25 TCAC is a light rail alignment that will serve the

1 City of Tigard including the division of sufficient
2 station locations to serve our expanding population
3 base.

4 Another key factor in our recommendations
5 is the preservation of naturally occurring
6 affordable housing. The TCAC has had project
7 reviews by Metro and Tri-Met staff setting the DEIS,
8 heard feedback from our liaison to the Southwest
9 Corridor Community Advisory Committee, and received
10 input from city staff and city council liaison.
11 These perspectives inform our discussion and this
12 recommendation.

13 Regarding segment C preferences, the line
14 configuration, the DEIS studied six route proposals
15 through the Tigard area. The TCAC strongly prefers
16 a through route rather than a branched route. This
17 option ensures regular and frequent service to the
18 Tigard Transit Center providing access to the area
19 near the transit center and in connectivity to the
20 area south and west that would not be served by the
21 Southwest Corridor Light Rail.

22 The route into downtown, Ash and Clinton
23 alignments provide access to the downtown area west
24 of I5 and Highway 217. The TCAC prefers the Ash
25 alignment to the Clinton alignment based on cost and

NAEGELI
DEPOSITION AND TRIAL



(800)528-3335
NAEGELIUSA.COM

1 travel time considerations, as well as environmental
2 impacts.

3 We strongly urge the steering committee to
4 consider the potential for incubating locally owned
5 businesses, developing small retail and service
6 businesses for commuters, providing structured
7 parking and redevelopment opportunities.

8 Another key consideration is the
9 possibility to use property remnants for affordable
10 housing. The TCAC prefers the Elmhurst alignment
11 due to the original alignment's impacts on the
12 existing roadway and businesses along the Beveland
13 Road route.

14 The TCAC is supportive of further
15 exploration into the 68th Parkway refinement that
16 promotes better station spacing in the triangle with
17 the caveat that service parking is not appropriate
18 at this location while structured parking is highly
19 desirable.

20 Station placements, Tigard triangle
21 station locations, we support the locally preferred
22 alternative that results in two stations in the
23 triangle. Given the size and the area of the Tigard
24 triangle, the provision of two stations is
25 necessary.

NAEGELI
DEPOSITION AND TRIAL



(800)528-3335
NAEGELIUSA.COM

1 The downtown Tigard station
2 recommendation, the TCAC strongly considers a
3 station located on or near Main Street as shown in
4 the original alignment segment with the DEIS.
5 However, concerns were raised about crossing Hall
6 Boulevard at two locations and the traffic
7 implications of closing the street upwards of 300
8 plus times a day were considered too onerous to
9 support.

10 Also, the probable route towards Main
11 Street would result in the destruction of a
12 substantial quantity of naturally-occurring
13 affordable housing, which the TCAC opposes.

14 MS. KEHE: So we can accept the rest of
15 your comments in writing.

16 MS. ROGERS: Okay. Sorry about that.

17 MS. KEHE: Thank you very much.

18 MS. ROGERS: Thank you. Sorry about that.

19 MS. KEHE: Is it Jerry Parker?

20 MR. PARKER: Terry.

21 MS. KEHE: Terry. I apologize, Terry
22 Parker, followed by Roger Eberman.

23 MR. PARKER: My name is Terry Parker. I
24 live in northeast Portland and I'm a property owner
25 in northeast Portland.

NAEGELI
DEPOSITION AND TRIAL



(800)528-3335
NAEGELIUSA.COM

O35: Tualatin Aging Task Force

TUALATIN AGING TASK FORCE
P. O. Box 981
Tualatin, Oregon 97062

July 30, 2018

Eryn Kehe
Senior Communications Specialist
Metro
600 NE Grand Avenue
Portland, Oregon 97232

Re: SW Corridor Plan DEIS Report

Dear Eryn:

On behalf of the Tualatin Aging Task Force, we respectfully submit that this committee strongly advocates for leaving the Village Inn in its current location and request that TriMet/Metro consider other options available for the terminus, parking garage and bus access.

Sincerely,



Susan C. Noack, Chair
Tualatin Aging Task Force

O36: Tualatin Chamber of Commerce



TUALATIN
CHAMBER of COMMERCE

July 30, 2018

Eryn Kehe
Senior Communications Specialist
Metro
600 NE Grand Ave.
Portland, OR. 97232

RE: SW Corridor Plan DEIS Report

Dear Eryn:

On behalf of the Tualatin Chamber Board of Directors, I submit to you the resolution passed by the Board on July 17th, 2018:

The Tualatin Chamber Board of Directors moves to support the SW Corridor Light Rail project but agrees with the Chamber's BAC (Business Advocacy Council) that TriMet and Metro need to provide other options for the terminus while leaving the Village Inn in its current location

Sincerely,

A handwritten signature in blue ink that reads "Linda Moholt". The signature is fluid and cursive.

Linda Moholt, CEO, IOM
linda@tualatinchamber.com

PO Box 701
8101 SW Nyberg St., Suite 102
Tualatin, OR. 97062

Phone: 503-692-0780
Chamber@tualatinchamber.com
www.TualatinChamber.com

O37: Urban Design Panel

Email:

From: [Brian Campbell](#)
To: [swcorridordeis](#)
Subject: SW Corridor comments from the Urban Design Panel
Date: Thursday, July 26, 2018 5:28:58 PM
Attachments: [SW Corridor 7.26.2018 UDP comment letter.docx](#)

Attached is a letter from the AIA/APA/ASLA Urban Design Panel

Thank you

--

Brian Campbell, FAICP
Urban Planning and Design
Portland, Oregon

Legislative and Policy Committee, American Planning Association
Board of Directors, Oregon Chapter of APA



Urban Design Panel

July 16, 2018

SW Corridor Project

Metro

Portland, Oregon

RE: COMMENTS ON SW CORRIDOR DEIS

The Urban Design Panel is sponsored jointly by the Oregon and Portland chapters of the American Institute of Architects, the American Planning Association and the American Society of Landscape Architects and composed of urban design professionals from those three organizations. The Panel had a presentation from City of Portland and Tri-Met SW Corridor project staff on July 5th and this letter reflects the comments from approximately 25 members of the Portland urban design community who attended that meeting, and subsequent study of the DEIS.

The consensus of the Panel was that this is a critical project for the Metro region. Without completion of this last segment of the light rail network the region will always suffer from an inefficient and inadequate set of mode choices in its transportation system, resulting in increasingly congested highways, especially in the I-5 south corridor. The SW Corridor is critical for the region to meet the transportation needs of its fast growing population.

This project also provides the best transportation option to ensure that affordable housing choices can be provided in this corridor through much increased redevelopment opportunities surrounding the new stations. This factor should be added to the list of Needs under S.2.

Specific Comments

In the presentation the Panel primarily discussed the Portland segments of the proposed line, but the issue of maximizing the opportunity for complete communities and affordable housing is important for all segments. It is imperative that Metro places a strong emphasis on creating complete communities surrounding each station. Specifically in segments A and B, the City of Portland needs to focus on creating significant new affordable housing opportunities along

Urban Design Panel membership and the processes and professional standards utilized by the UDP in their review of projects and policies are endorsed by the Boards of Directors of AIA Portland, ASLA Oregon and the Oregon Chapter of the American Planning Association. The project-specific opinions of UDP members do not necessarily represent the opinions of their respective Boards of Directors.

403 NW 1st Avenue
Portland, Oregon 97209-2905

Urban Design Panel

Portland area Oregon Members of the King of the Hill Club, American Planning Association and American Society of Urban Design/UDP.

street connections perpendicular to Barbur at each station area since, given its width, there will be limited opportunity for appropriate pedestrian-oriented housing along Barbur Blvd. itself.

The need for providing complete communities around each station also indicates a preference for the center-running line in Barbur rather than the freeway adjacent options in most places. The Panel would like to be part of a regional effort to further study how to enable the development of these station area communities to ensure that they are pedestrian-oriented, provide everyday services for existing and new residents as well as good access to the region's transit network.

The most important station area on the line is Gibbs St. because of its relationship to OHSU. The region's largest employer and most important medical facility has always lacked adequate access to the region's transportation system. The importance of this new opportunity to provide that access cannot be over-stated. This new transit access will provide tremendous relief for the completely inadequate road access from which this facility has long suffered. Because it is so important it's critical to get this access right. The redevelopment of this station area needs to be carefully considered to ensure maximum usage of the station as an entrance to OHSU and the ability of the surrounding development to provide both new accessible medical facilities and higher intensity housing and commercial opportunities.

Due to the importance and strategic significance of the synagogue site on Barbur we strongly encourage further study of this opportunity. The enormous potential for parking, transit facilities, community facilities and a meaningful connection between Terwilliger and Barbur is very obvious here. We urge the affected parties to consider further design studies to explore the potentials for facilitating development for transit, higher density office and housing, and local community facilities. We believe that private development linked with Trimet's transportation goals could create a significant nexus at this site.

Formatted: Font (Default) Times, 10 pt

The redevelopment of the Barbur Transit Center is also an important focal point. There must be a strong housing component here as well, with reduced emphasis on park-and-ride. It is clear that in the future parking facilities will be increasingly obsolete as transit systems become more robust with many more first/last mile options, including autonomous vehicles.

At the 53rd St station there is a great opportunity to create a strong commercial/affordable housing corridor connecting the station to PCC, in addition to providing shuttle service. The distance to the campus from the stop is close enough that encouraging and facilitating walking should be a primary focus of this connection.

[Any more comments, changes, etc. ???]

Thank you for the opportunity to comment.

Urban Design Panel membership and the processes and professional standards utilized by the UDP in their review of projects and policies are endorsed by the Boards of Directors of AIA Portland, ASLA Oregon and the Oregon Chapter of the American Planning Association. The project-specific opinions of UDP members do not necessarily represent the opinions of their respective Boards of Directors.

403 NW 11th Avenue
Portland, Oregon 97209-2905

Urban Design Panel

Consists of Organizational Members of the American Institute of Architects, American Planning Association, American Society of Landscape Architects and Oregon

Urban Design Panel Executive Committee

Dave Otte, AIA

Brian Campbell, FAICP

Sean Batty, ASLA

Bob Boileau, AIA, AICP

John Spencer, AICP

Brian Stuhr, ASLA

Urban Design Panel membership and the processes and professional standards utilized by the UDP in their review of projects and policies are endorsed by the Boards of Directors of AIA Portland, ASLA Oregon and the Oregon Chapter of the American Planning Association. The project-specific opinions of UDP members do not necessarily represent the opinions of their respective Boards of Directors.

403 NW 11th Avenue
Portland, Oregon 97209-2905