

DRAFT

Addendum to
Public Comments
(April 30 - June 14, 1999)

Compiled for JPACT
June 9 - 14, 1999

South/North Corridor Project
Supplemental Draft Environmental Impact Statement

SUMMARY

These comments are an addendum to the *draft* Public Comment Document for the South/North Supplemental Draft Environmental Impact Statement refer to a proposed alignment in North Portland from the Rose Quarter to the Expo Center. This addendum contains comments received from June 9, 1999 through the end of the comment period on June 14, 1999.

Almost 400 total comments were received concerning the proposed Interstate Max route. There were duplications due to the fact that many people commented at hearings as well as in writing. Also many sent e-mails as well as letters. The final document will contain an index that will reflect these duplications when referencing the name.

An additional 69 comments were received specifically in support of a group known as SPIRIT. The comments all supported their effort to seek \$4 million to invest in free transit for youth going to and from school.

The majority of all comments favored the proposed alignment on Interstate Avenue. There were a variety of reasons that people gave in expressing support for the route. The most frequent reason was that light rail supports the region's 2040 growth management plan and goals to preserve the region's urban growth boundary while reinvesting in existing neighborhoods. Another was that light rail is a catalyst for other investment along N Interstate Avenue and would enhance the livability of the local neighborhoods. It was also cited as a fast, reliable, comfortable and affordable transit service and helps preserve environmental quality.

Some of the reasons for expressing opposition to the proposed route were the fact that voters had opposed light rail last November and it should not be pursued because it still uses public (taxpayer) funds. Another objection was that removing a lane in each direction on N Interstate Avenue would cause major traffic impacts. There were concerns about the loss of bus service on N Interstate which is more accessible to elderly and disabled.

Some supporters and opponents of the project expressed concern about the use of tie and ballast for track surface and felt it would impede economic development and possibly be a safety hazard for emergency services. Others expressed concern about the source of city funds for the project and were opposed to taking funds from existing urban renewal areas. Another concern was for safety of school children crossing the tracks and safety at the station areas.

There were also suggestions to improve bicycle access to station areas and better bus connections to the light rail.

Addendum to

Written Comments Received June 9 - 14, 1999

(Comment Cards, Letters and Faxes)

RECEIVED

JUN 11 1999

Irene J. Casey
3938 N Massachusetts Ave
Portland, OR 97227-1034

June 8, 1999

Mr. Ross Roberts:

We live one block west of Interstate
and a half block South of Shaver.

During rush hour, both morning
and evening, Interstate is very
busy with people trying to avoid
the traffic on I-5. Many nights,
Friday, especially, with people
trying to get out of town for the
weekend. Commuters going North
come on to Interstate from King
Street to avoid the stop and go
on the Freeway. The traffic
many times is lined for 2 + 3
blocks, both lanes. What will
it be with only one lane open
if Max takes two lanes? It
will be a catastrophe!

There is no way, other than
Interstate or the Freeway for
our neighborhood to go either
North or South. We can come
home from the North via
Greeley, then circle around to

Interstate at the foot of the hill. This will be an extremely slow route for all of us.

To take two lanes from Interstate is very poor planning. Why not put Max along the Freeway in the parking lane. The rightway is already owned by the State.

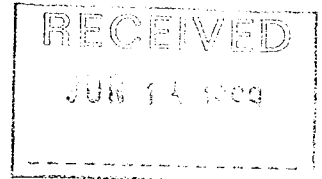
With only six outlets from the neighborhood, which are all onto Interstate, how many will remain intact with the max plan? How will you accommodate the ever increasing Kaiser traffic? At the same time, how will the neighborhood be accommodated?

It sounds as if the main concern is to spend the Federal money so as not to lose it.

Thank you for your consideration.

Sincerely,
Shene J. Casey

June 11, 1999



Mr. Ross Roberts, High Capacity Transit Manager
METRO
600 NE Grand Avenue
Portland, OR 97232

RE: COMMENTS ON SDEIS, FULL-INTERSTATE ALIGNMENT ALTERNATIVE

Dear Mr. Ross,

I am pleased with the assurances that no direct demolitions and displacements - of either homes or businesses - will result from the new potential Interstate Avenue alignment for light rail transit in North Portland. I have read the SDEIS and have the following questions, concerns, and comments:

TRAFFIC: There will obviously be tremendous traffic impacts during construction of any project of this magnitude. I am more concerned with long-term traffic impacts on nearby streets and intersections. The SDEIS Level of Service analysis (p. 18) shows that of the ten intersections, peak hour LOS improves for only one intersection, remains the same for four (one at B, one at D, and two at F), and worsen for four: one A to C, one B to D, and two C to F.

I am concerned about traffic diversions to nearby streets, especially N Albina and N Vancouver Avenues. Both streets are lined with many well-kept, vintage homes that are built to property line. The recent construction of an oversized bicycle lane on N Vancouver has reduced vehicle lanes to one. If you travel these two streets, you know that there are often children in front yards and on sidewalks. I question the ability of these two streets in particular to handle projected traffic increases.

AIR QUALITY: Light Rail is often cited as a strategy to reduce vehicular air pollutants. It appears (p. 18) that both the No Build and Interstate alternatives will result in the same concentration of CO (carbon monoxide).

FINANCING: I am greatly concerned about and opposed to ANY diversion of Urban Renewal Funds from ANY other North/Northeast Urban Renewal Districts to pay for Interstate LRT. Each designated district already has more than enough unmet project needs, and cannot be expected to pay for projects in another district. I do not believe that diverting funds would be upheld as a legally permissible use of those funds.

Additionally, I question the City of Portland's ability to identify and secure up to \$30 million for financing the local share of building Interstate LRT. Our City's financial state may be better than most, but the likely sources of any magnitude of local funding - and how other public services and programs will be impacted - must be identified and analyzed.

PROJECTED RIDERSHIP AND COSTS TO CONSTRUCT AND OPERATE/MAINTAIN:

The SDEIS analysis for projected transit ridership (p. 15) projects 4500 new transit riders for Full Interstate compared to No-Build. Since these are transit riders, both bus and LRT, it is difficult to determine the different "benefits" between the two transit modes.

It must be noted that the projected 4500 new weekday transit riders are for ONE-WAY TRIPS, indicating that the actual new projected riders would be 2250 persons, since each person presumably travels to and from a destination. It also must be noted that ridership projections are for year 2015, many years into operation.

The construction costs for Interstate LRT are estimated to be \$223 million, in 1994 dollars, with annual operations and maintenance costs of \$6.8 million, in 1994 dollars. I question the financial feasibility of both construction and annual O & M costs, for such a small projected new ridership.

ECONOMIC DEVELOPMENT: All of the economic development analyses completed during the earlier DEIS, including the earlier Interstate alternative, clearly call for the need for substantial public financial incentives and subsidies (ranging from 20 to 40%) to achieve new development and redevelopment objectives in North Portland. Any analysis of the relative costs and benefits of Interstate LRT must recognize and include the real costs of those subsidies. These costs will be borne by taxpayers throughout the city.

THE VISION: The SDEIS envisions compact, pedestrian-friendly development and a "Main Street" character for Interstate Avenue. This will never be realized if all new development is the now-typical mixed-use building, with split-face concrete block on the ground floor, vinyl or manufactured siding products on the upper floors, and white vinyl windows. Typical tenants are video stores, check cashing businesses, mailbox services, and the occasional franchise coffee stop. The new ground floor tenants are rarely the traditional "Main Street" or neighborhood business, locally owned and operated, providing true neighborhood goods and services.

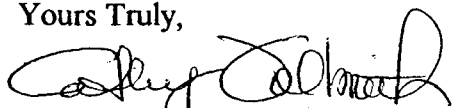
We can and must do better than that, given the public outlay of capital, both federal and local, that is required for any major public project that presumes neighborhood re-development as one of its objectives.

SOCIAL AND ECONOMIC JUSTICE: If Interstate LRT moves forward, residents of North/Northeast Portland must be able to share in the projected economic benefits of both construction and its aftermath. **CONSTRUCTION SET-ASIDES** for North/Northeast Minority owned businesses should be implemented. **JOB PLACEMENTS** for North/Northeast residents should be established, by percentages, for all LRT contractors. **NEW BUSINESS OWNERSHIP** programs for North/Northeast residents, for business development along the LRT line should be implemented, along with programs for **LOCAL RESIDENT JOBS** within all businesses.

Finally, care must be taken to ensure the survival and preservation of neighborhood families and residences adjacent to and immediately east and west of the Interstate LRT line.

I continue to believe that the No-Build alternative is the best alternative. It envisions a truly regional and viable bus transit system, with out the major capital outlay, construction impacts, and other problems that come with light rail transit.

Yours Truly,

A handwritten signature in black ink, appearing to read 'Cathy Galbraith', written in a cursive style.

Cathy Galbraith

Cathy Galbraith
2128 SE 35th Place
Portland, OR 97214

COMMENTS

It seems incredible to me that you will not let this bad idea die. Interstate is the only logical avenue to keep as it is, to help carry the people from North Portland to their homes. Cutting it in half will not only cause more congestion on I-5, but mainly it will shift traffic to other parallel main streets, which are already crowded. It will back up the main streets that cross Interstate and eliminate many crossings. The car stops are over twice as far apart as the bus stops. How is this an improvement? Buses in this application are already there, more dependable, more flexible, and less dangerous from many standpoints such as stopping. A bus can stop in a fraction of the distance that a train can. If pollution is your goal, put in trolley busses with on board back up generators. You can have your cake and eat it to. The only thing I can see Max may save on, is a few bus drivers, because the trains can carry more people but still only require one driver. Of course it is doubtful that very many buses will be eliminated. I hate to even mention the enormous cost to build this over grown trolley system which is supposed to be paid for with money that is not from the taxpayers. THERE IS NO SUCH MONEY unless it comes from private donations. Since there is no money of this nature, then the election that was just held should give someone a clue that the people do NOT want ANY money the government has to be used for a North/South Max, and this is regardless of what you want to call the funds and which branch of the government they come from.

Now what IS needed seems incredibly obvious. A HIGH SPEED train running down the side of I-5 that goes clear to the other side of Vancouver and only stops about 5 times between the ends of the line. Stops could be at the Rose Garden, Going, Lombard, the Expo Center, Jantzen Beach, downtown Vancouver and at a park and ride North of Vancouver. This usage would justify having a train. Using a train as an over grown streetcar that would not even have surface mounted rails for neighborhood crossing ease, safety, and multipurpose road use, does not.

6/13/99

Mike DeSart

288-1928

4137 N. Colonial Ave.

Portland, OR 97217

June 14, 1999

Mr. Ross Roberts
High Capacity Transit Manager
600 NE Grand Ave.
Portland or 97232
FAX 503.797.1929
Dear Mr. Roberts,

Subject: Comments to N/N DEIS

The have taken the opportunity to study the DEIS and have a number of issues which should be evaluated or taken into consideration.

In the Preface as well as in S.1 Project History the Listening Posts meetings are addressed. It should be obvious to Metro/Tri-Met leadership that citizens who had opposed S/N Light Rail did not turn out because Light Rail had just been defeated. Also, the flyer announcing the meetings did not hint at a resurrection of Light Rail. I do remember Councilor Kivstad statement at JPACT that the universal solution expressed at the Listening Posts were HOV lanes.

S.4.3 Freight Access The staff needs to address the issue of east-West traffic especially to Swan Island before any final decision.

Table S.6-1 This cost summary is wanting for an explanation as to where funds will come from. If Metro/Portland gives \$80M some other projects will be shelved or canceled. The region should have opportunity to address this before a final commitment is made.

2.4 Capital Costs In the last paragraph on page 10 eighteen cost categories are mentioned; however, Table 2.4-1 has only seventeen categories.

3.2.3 Local Impacts Downtown Portland It is proposed that Light Rail operate at 21-23 trains per hour. Tri-Met needs to demonstrate its ability to operate at those levels prior to undertaking this program. Personal observation says as the trains move toward capacity it takes longer to load and unload each train. Tri-Met should be required to demonstrate their ability prior to construction.

4.4 Air Quality Impacts No mention is made to gases formed by arcing overhead wires. Should not this issue be addressed in the SDEIS?

Thank you for considering my comments

Regards,

Dick Jones
Dick Jones
3205 SE VINEYARD RD
OAK GROVE OR 97267
503 652-2988
FAX 503 353-9619

Kristin Jager
①

Interstate MAX Public Comments

I have already written, testified, and voted; I cannot believe I have to expend time and energy at this again. We have already voted down light rail three or four times. Do you ever listen?

Once again I cannot fathom having auto traffic on Interstate street reduced to two lanes and turn lanes only. Obviously none of the project planners live in or travel through this North End neighborhood. If they did they would find this plan inconceivable. This is the only other main access street north and south when there are accidents or congestion on the I-5 freeway unless you cross clear to 205. Just because you install light rail that will not eliminate freeway accidents, or the need to deal with the resulting traffic problems. If there is such concern over dealing with Vancouver traffic which seems a main issue here it seems it would be more economical to subsidize "desirable" train and bus access to downtown from Vancouver as when the I-5 bridge was under repair recently. Normal traffic was greatly reduced at that time. By the time Clark County is convinced to accept light rail our system would probably be out of date and incompatible. Until Clark county is willing to participate in this project from ~~their~~ end I do not believe it is right to expect our neighborhoods to subsidize their travel which is what we will be doing with this project.

Kristin Dager

Also we will be doing it at the cost both of dollars and environmental invasion of the North neighborhoods. Then on top of ~~surviving~~ the construction, congestion, invasion and redesign of our neighborhood and community we will also be asked to increase our property taxes because of "perceived" improvement and property values.

I chose to purchase a home in ~~the~~ Kenton neighborhood almost fourteen years ago because it was basically a nice quiet (except for PIR) single family dwelling neighborhood with a reasonably high owner occupancy, some open air, empty lots parks and a generally pleasant friendly environment. Now we have been targeted for infill, houses crammed onto twenty five foot lots and rowhouses popping up in fours and fives where one or two family homes would have been before. The former Boys and Girls club playing field has been replaced by a cracker box housing development. Now you want to invade our neighborhood with light rail and high density multiuse housing. This will also be at the cost of many peoples businesses which will never survive the light rail construction process. Not so many displacements this time so it will not seem so major except for those who have to survive it.

③

I, and other even longer term members of the Kenton neighborhood find ourselves feeling that the main people in the area desiring this project are members of a business district or contractors who stand profit from it financially, as well as those who believe that just because government funding exists it must be spent. We are tired of feeling that our wishes are not heard or just ignored because our perception of progress does not mesh with the great out of control political machine. Most of us do not have a business interest just a personal one - livability! This kind of "progress" is what drives people like me to the suburbs.

I hear some young professionals that have moved into the north neighborhoods saying that this project has to happen or they will move out to which many of us say "fine". We like our neighborhood the way it is. That was why you moved here in the first place. If you don't like it now then move somewhere that suits your needs go downtown or where light rail already exists, don't destroy our neighborhood because it doesn't fit your vision. We know how we like our neighborhood, ~~the~~ the way it is! For many of us light rail is not progress but another government project being crammed down our throats and neighborhoods.

Kristin Jager
2549 N. Arlington Pl
Portland OR 97217

5229 East Burnside Street
Portland, Oregon 97215-1184
June 14, 1999
PHONE: 503-235-3871

Mr. Ross Roberts
High Capacity Project Manager
Metro
600 NE Grand Avenue
Portland, OR 97232

Re: *Comments on South/North DEIS*

Dear Mr. Skiles:

Attached are my comments, delivered this day to Metro, on the *Supplemental Draft Environmental Impact Statement* for the South/North Corridor Project, dated April 1999.

Sincerely,



Michael J. (Myles) Cunneen
Former Transportatin Planner, Metro

cc: Federal Transit Administration

INTERSTATE MAX: A PROJECT TO GET THE PUBLIC TO PAY FOR MORE TRAFFIC CONGESTION

by Myles Cunneen

The following are my comments on Metro's *Supplemental Draft Environmental Impact Statement* (SDEIS) for the South/North Corridor Project, dated April 1999.

INTERSTATE AVENUE: A STREET WITHOUT A MISSION ?

At a presentation on this project on May 5, 1999 at the Portland Conference Center Doug Oblitz of the law firm Shields, Oblitz, and Johnsen said that Interstate Avenue was "*a street without a mission*", no longer necessary after the opening of I-5 in 1964. This "*street without a mission*" theme has been touted by Metro and City staff have tried to perpetuate in order to rationalize this project.

Let's look at the facts. Prior to the opening of I-5 in 1963 Interstate Avenue was carrying about 20,000 vehicles daily near Portland Boulevard. After I-5 opened in 1964 this dropped to about 6,000 vehicles daily. It has since greatly increased. The SDEIS (page 21) shows that Metro projects that under a "No Build" condition daily traffic at this same point on Interstate Avenue would be 2,300 in the peak hour -- equivalent to about 23,000 vehicles daily.

Therefore, Metro's own analysis shows that this "*street without a mission*" will be performing exactly the same mission it did prior to the opening of I-5: carrying over 20,000 vehicles daily. The need for Interstate Avenue to be preserved, if not enhanced, as a major arterial roadway is clear from Metro's own projections.

If anything Metro under-estimates the traffic demand that Interstate Avenue would face in the future. Their forecast modeling shows fantastically worse congestion and delays in peak periods along the section of I-5 adjacent to Interstate Avenue. Under those conditions -- and certainly when major freeway incidents occur -- it is logical assume that more motorists would divert to Interstate Avenue as an alternate route.

In 1990, while a member of the Metro Transportation Planning staff, Assistant Director Richard Brandman told me that he had habitually used Interstate Avenue as an alternate route when he lived in that area but that he doubted whether many other motorists would ever be "smart" enough to emulate his own behaviour. Traffic congestion on I-5 will be far worse on I-5 in the near future -- according to Brandman's own staff. Somehow alternate routes which are suitable for Metro insiders to use are unsuitable for the general public who aren't "smart" enough.

Obltitz's "street without a mission" claim is particularly odd coming from a prominent lawyer. Interstate Avenue is a state highway as Route 99W. The Federal, State, and City governments all have officially designated Interstate Avenue as a Principal (or Major) Arterial road under the Federal Aid Urban Systems (FAUS) program. The City, in its own peculiar classification scheme, has designated it as a Major City Street, which is much the same thing. The Federal guidelines on functional roadway classification clearly indicate that a road with a daily traffic demand of 20,000 or more should be at least a Minor if not a Principal (or Major) Arterial.

These designations were made after what the City government claims were careful studies as part of a transportation planning process which assessed the needs for moving traffic in this area. Their obvious conclusion was that Interstate Avenue was needed as a Principal Arterial even under the lower traffic conditions which prevailed in the 1980's. It will certainly be more needed in the future.

There exists a body of law, regulations, and guidelines in Oregon which essentially mandate that a major route cannot be re-designated to a lesser roadway status unless planning studies conclude that there no longer exists a need for such a major route. The transportation planning process is supposed to assess NEED. Metro forecasts clearly indicate a greater NEED for Interstate Avenue as a Principal Arterial route in the future than existed before I-5 was built.

If ever there was a street WITH a mission it is Interstate Avenue.

TRAFFIC IMPACT OF TWO-LANE INTERSTATE AVENUE

Common sense would dictate that if you reduce the number of lanes that traffic travels on in a given corridor and yet gain considerably more traffic in the future you will achieve alot more traffic congestion. Demand would rise yet supply would fall. This is exactly what this project will mean to North Portland. There will be less capacity to handle north/south traffic (fewer lanes) yet there will be more of this traffic than ever.

The essence of this project is to force the public -- who have voted down this project twice in the past three years -- to pay for more traffic congestion by emasulating one of the best arterial routes in the city and to grant tax abatements to developers to build a corridor of apartments and shops along this avenue, generating even higher traffic volumes in the future.

Even Metro's own forecasts indicate no reduction of peak hour traffic under this project. Under the "No Build" condition peak hour traffic crossing the Portland Boulevard screenine in this corridor would be 15,760 in 2015. With the project this would be 15,220 because 540 of the 15,760 would divert outside the corridor (SDEIS page 21) This would result in a higher ratio of traffic to available through lanes within the corridor (i.e. greater congestion). It would also result in longer and more circuitous vehicle trips (diversion outside the corridor) at lower speed with a consequent increase in air pollution and fuel consumption.

It is likely that traffic levels would actually be higher with this light rail project than without it. No solid impirical evidence exists suggesting that the inclusion of light rail in a given corridor results in any significant traffic congestion. Yet it certainly increases auto trips made to access transit service. There would be more park-and-ride use. People who now can walk to a bus going downtown would find themselves at a greater distance from the nearest light rail station so many walk-to-bus commuters would become drive-to-MAX commuters. This is exactly what happened on the East and West Side LRT lines. The additional development which Metro and the City would foster as part and parcel of this project would certrtainly add to, not subtract from, corridor traffic.

Lois D. Achenbach
2005 N. E. 46th Avenue, Portland, OR 97213-2007
(503) 281-0063
Monday, June 14, 1999

Mr. Ross Roberts
Metro
600 N. E. Grand
Portland, OR 97232

RECEIVED
JUN 14 1999
11:24 am

RE: PROPOSED INTERSTATE AVENUE MAX: PLACEMENT OF EXPO STATION
(Comments for the official record)

While I support the building of Interstate Ave. MAX, I am requesting that the Expo Station be placed directly adjacent to the Exposition and Recreation Center rather than approximately 1100 feet to the east. *MAX must be convenient to be well used.*

- The present proposed long distance to walk or to traverse in a non-motorized wheelchair will discourage use of MAX by the handicapped. Not everyone who is handicapped has a very visible impairment; heart disease, asthma, and arthritis are examples. Also affected are those who are temporarily impaired, such as some users of crutches or those recovering from surgery. There is a reason why those with parking permits for the disabled are allowed to park in special areas next to entry doors of establishments; it is difficult for these people to maneuver or walk for long distances--the massiveness of the Center itself is a challenge. We must not add a long hike to reach the front doors.

- Not everyone in the region has an automobile or access to one. These people have been denied use of the Expo Center because of the lack of mass transit to the area during the hours and days when most of the events are staged. The Expo Center is a public facility using public tax money and should be available and accessible to all.

- Many of the events at Expo are sales events. Those who are helping the environment by taking mass transit (MAX) should not be penalized by having to haul their purchases across a huge parking lot. Having a station close to Expo would encourage use rather than discourage it, whether users have purchases or not.

- As the age of the population increases, debilitating conditions and the need for more conveniences will increase. Many of the Expo events cater to a more elderly population than the mix found in the general population. Some of these people shouldn't drive or prefer not to drive on I-5. These will be a portion of your customers if you do not force them to walk across a huge parking lot dodging motor vehicles.

- Removing a row of parking is not reason enough to place MAX 1100 feet from the Expo buildings. Aren't we trying to get people out

June 14, 1999
Comments--Interstate Ave. MAX

of their cars and onto mass transit to relieve congestion? If North MAX is convenient, there will be less need for parking and even more people will attend events. The cost to Expo of running a shuttle from the MAX station would exceed the loss of revenue from the removed parking.

• I understand that one of the considerations for keeping the MAX alignment far to the east is to avoid some wetlands. Can not a portion of these wetlands be swapped for those in another place so that MAX can better serve Expo?

• Another reason given for the distance east of the MAX station is to prepare for a future extension of the MAX line to Vancouver. As MAX is expected to have its own bridge over the Columbia River, can it not be placed several hundred feet west? An alternative would be to build a curve into the alignment to serve Expo, a solution used on East/West MAX.

• The use of the berm on the east side of the Expo property is viewed by the engineers as an aid in raising MAX to go over Marine Drive. It is well known that changes in elevation discourage pedestrians as well as making it more difficult for them to use a facility. At present MAX would cross Marine Drive at its widest point. Closer to Expo, Marine Drive narrows considerably. The reason that the Hollywood MAX Station is the worst one in the current system is because one must go up two flights of stairs to access the elevator to reach the light rail platform.

Please do not saddle the North MAX route with a station that will serve the few rather than the many. Build it for the future. Make it USEABLE and CONVENIENT.

Sincerely yours,


Lois Achenbach

JUN 14 1999

June 13, 1999

Interstate MAX Public Comments
Attn: Ross Roberts
Metro Transportation Department
600 N.E. Grand Avenue
Portland, Oregon 97232-2736

Before moving to substantive matters, a word about the process is in order. While, from the points of view of the governments sponsoring the project, the use of the phrase 'Supplemental Draft Environmental Impact Statement' during this stage seems appropriate, the phrase itself does not convey to the public that this is a critical period in the process, or that a key decision point is about to be reached. The word 'draft' suggests that everything which is happening now is all very preliminary, and that no one need be much concerned until a lot of wordsmithing occurs (in other words, why pay attention yet?). 'Environmental Impact Statement' may relate to frogs or fireflies (I'll refrain from adding 'suckers') around Delta Park, not urban sprawl and traffic jams and cold, hard cash.

The initiated use the phrase as a term of art with a specific meaning, and realize that the approval or disapproval of the Statement does constitute a key decision point. I'm not at all confident that the public realizes this, or that the contents of the Statement are as comprehensive a description of all of the elements of the project as they actually are. Or, most importantly, that one of its principal opportunities to influence public policy is at stake during this phase.

This term of art ought to be translated into terms which the broad, general public can readily understand during the course of this phase of this and other projects. The initiated may continue to use the phrase "in-house", but a much greater effort ought to be made to explain the importance of this particular stage of the process to the public. Perhaps something like "Key Decision Point Concerning Light Rail" itself might be used in public announcements, hearings and meetings.

One more observation about public understanding of the process. In the case of Interstate MAX, as in so many others, the governments involved have combined in such a way as to make it very difficult for a citizen to ascertain which one of them is principally responsible for the project and, consequently, to which government effective comment ought to be directed. Metro, Tri-Met and the City of Portland may have a clear understanding of their respective roles, but to the average citizen onlooker the roles seem shared or folded together, and the process confusing. The apparent complexity created by this combination discourages citizen involvement.

An honest effort ought to be made to alert the public in advance to the specific role each government is expected to play, the time-lines for each and how they correspond, and to which government effective comment can be directed at any particular moment. When I make this observation, I might well be referring to the outline of hearings which appeared in *The Oregonian* on June 13, 1999, which seems to set forth a variety of

activities by a jumble of governments. Only someone who spends a lot of time penetrating the fog can hope to comprehend the process. Mr. Cotugno remarked to a small group in January (concerning light rail projects) that Metro is generally in the lead during planning stages and Tri-Met leads in implementation stages, when it is time to build. This simple statement provides illumination. But the average citizen would not know how things work from the information presented so far in this process. Metro, and other governments, should strive toward providing greater clarity in these areas as a general practice: and it's not too late to make a significant effort with respect to Interstate MAX prior to the Metro Council hearing on June 24, 1999.

Shifting from process to substance, but continuing upon the theme of full disclosure for the purposes of eliciting informed public participation, there has been an inadequate explanation and discussion of the details related to funding the project. Informed public comment demands full disclosure of all known facets of a proposal. The SDEIS (Sec.6.1.1.1, pp.41-43) speaks only in general terms about sources of funds, and itself acknowledges that there are requirements for funding which is simply not available. At the very least, the various ideas which are being considered ought to be laid on the table with as much specificity as possible, even if they have not been finally identified as those to be followed, and even if they may cause public consternation at this point in the process. After all, if they are the best ideas currently available, it is very likely that they will wind up being proposed, in one form or another, as a matter of final fact.

A significant portion of the project capital costs are to be met through the use of Regional Compact Funds. But the SDEIS says this fund will have to be *created* (SDEIS, p. 43) for the purpose. Details concerning the City of Portland's contribution are entirely absent. While, technically, such details may not need to be provided under EIS requirements, they are critical to public understanding and informed participation. Tri-Met's suggested issuance of revenue bonds (SDEIS, p. 43), which would require no voter approval, needs to be brought more clearly to the public's attention as part of this process, particularly in light of the voters' rejection of a bond measure in November. Failure to do so, and to explain and justify this substitute method, will contribute ammunition to the opponents of light-rail in the region (and to the opponents of Metro as a regional government).

From the outset of the discussion concerning both Portland Airport light-rail and N/S light-rail (now, Interstate MAX), one of the underlying speculations has been that the PDX light-rail project might somehow qualify towards satisfying the "local match" requirements for funding N/S. If there is validity in this, and if it is anticipated that this proposal will be made, that fact ought to be openly and candidly discussed publicly at this stage. While it is claimed that the PDX light-rail project, through "innovative financing", is to be wholly locally-funded, it is plain that funds of federal origin are going directly to that project, and merely passing through the MTIP process and the Tri-Met general fund (MTIP: RTr1, RTr2, and TEA-21 funds for Metro buses). These funds cannot, with candor, be identified as having a local source. The actual source funds in Metro's own capital reserve account (to be drawn upon for its contribution to the PDX project) might be deemed to be principally federal. While of a more remote origin, it also appears that the value of the land itself at PDX may have heavy federal flavoring, since alienation appears subject to federal approvals by virtue of the conditions imposed at the time of its acquisition from the Federal Government.

If now, in connection with Interstate MAX, it is anticipated that they will be once more described as being of local origin, it would appear that the public is not being given the facts it needs in order to participate in an informed way about the project. Disclosure of possible financing plans is critical, whether "technically" they have been finalized or not. Whether or not "citizen involvement" can be seen to have occurred (for purposes of satisfying federal law as a precondition to federal funding) depends upon disclosure of relevant facts to the public. I have little doubt that anyone seeking to litigate an affirmative decision relating to Interstate MAX, and who may be casting about for any and all grounds to support his position, would eventually strike upon the citizen involvement requirements of federal law. Regardless of my personal opinion as to the merits of Interstate MAX, I can observe that it is in the interests of Metro and its partners to be as open and candid as it possibly can during the current process in order to obviate claims arising from this direction.

Additionally, Metro in particular has opponents who attempt to stir public opinion (even to the point of suggesting Metro's abolition) upon the ground that Metro is attempting to find ways to 'dictate' developments in the region, contrary to the popular will. If a charge of lack of disclosure is made, another potential source of public resentment could arise. Metro is more vulnerable to these charges than the other agencies involved in Interstate MAX. I continue to support the achievement of the purposes for which Metro was created. I may disagree with decisions that Metro is making at any particular time, but I believe that the institution itself has great promise and that its continuity should be protected. But its continuity may depend to a unique degree upon the integrity it demonstrates in addressing the specific challenges it was shaped to meet.

Subjectively, I feel I should be a supporter of Interstate MAX. During the MTIP process, I wrote a letter encouraging the redevelopment of North and Northeast Portland as an alternative to creating heavier transportation demands at the edges of the Urban Growth Boundary. Although there is some dispute about the contributions Interstate MAX would make toward this objective, I am willing to be persuaded that it would be positive, provided the project and the City's proposed urban renewal district are not overloaded by concerns about "affordable" housing. In fact, gentrification is probably to be encouraged along the route (although that term is much reviled). Provision for "indirect displacement" of lower or fixed-income residents through rising property taxes could well be handled through implementing a plan for residential property owners similar to the one the City already has in place which allows deferral of the payment of property taxes by the elderly.

However, at some point it must be remembered that light-rail as a general alternative was proposed as a solution to problems (mainly of congestion, and air and water quality problems) which arise from over-reliance upon the automobile and other petroleum-driven vehicles. *Only if light-rail can be demonstrated to help solve the underlying problems can it be deemed to be justified.* It is not an end in itself.

Those who are suggesting alternatives to light-rail as more efficient in addressing the underlying problems have to be answered in some cogent way, not simply ignored or dismissed. Specifically, the various commentaries of Professor Mildner have to be taken up directly and candidly, particularly when he says that the SDEIS itself shows no appreciable reduction in congestion as a result of Interstate MAX. When an apparently reasonable

objection to a proposal is raised, and it is backed by apparently valid statistical analysis, the objection ought to be discussed in the public forum and a satisfactory response made.

It has not been made clear what volumes of traffic are expected to originate at the Expo Center which have to be relieved by light-rail. Nor has it been explained why it is expected that the Expo Center itself will be such an attractive destination that it absolutely demands light-rail service. In fact, it is obvious from all the surrounding circumstances (including the original N/S proposal) that Interstate MAX is not meant to serve the Expo Center, but that it forms the shaft of an arrow aimed at SW Washington, and that its real purpose (at least insofar as it extends beyond Kenton) is to penetrate that target. Mr. Seltzer's commentary in *The Oregonian* on June 13 point to this, but the assumptions underlying the construction of Interstate MAX are not being brought to the public's attention as a part of the public comment process, and it is very disappointing that they are not.

Interstate MAX would make some partial sense as a "stand-alone" project with potential future benefit if Clark County and other affected jurisdictions in Southwest Washington were to have formally recognized the problems of sprawl and over-reliance upon the automobile, and to have adopted growth management policies similar to Metro's. This has not happened, and there is no particular sign it will. To the contrary, Southwest Washington appears to revel in its growth and in its role as a residential "spill-over" area from the Portland metropolitan area. As some indication of this, the voters of Clark County have turned down light-rail, and have taken few tangible steps toward implementing useful growth management policies. These facts should loom large in our own discussion of Interstate MAX.

The simple availability of federal money for the Interstate MAX project shouldn't drive a decision with respect to it. A reasonable argument can be made that the Portland area's voluntary relinquishment of federal funds would free its Congressional delegation to criticize their unjustified expenditure in other areas of the country. This project should stand or fall depending upon whether it has a reasonable chance of accomplishing its purposes. As Councilor Bragdon has said, Metro ought to be able to explain and justify decisions when reasonable arguments are made in support of contrary positions. Even as a potential supporter of Interstate MAX, I believe an adequate response must be made to some of the criticisms of the project, particularly to the claims that it will not relieve congestion or improve air quality in any significant way. Absent such a response, the project probably ought not to proceed at this time.

If a decision is made to proceed, however, there are certain elements or implications of it which merit attention.

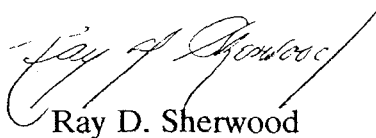
A troubling notion keeps reoccurring to me. There have been, and there continue to be, proposals to separate truck and auto traffic as a means of reducing the conflict between the two, and to reduce congestion on I-5. Looking at the map, and having some acquaintance with Portland from having lived here for fifty-three years, it is inescapable that Interstate Avenue is one of the two routes leading off the Interstate Bridge which offers north-south passage for separated truck traffic. Of those two, it offers the better access to areas already principally dedicated to the movement of freight with a heavy

trucking component (N. and N.E. Columbia Blvd, Highway 30, Swan Island, the inner railroad yards, and the distribution centers of the East Bank Willamette). If Interstate Avenue is to be reduced to two lanes of traffic by the construction and operation of Interstate MAX, it would seem that significant problems arise with the designation of the Avenue as a separated truck route due to the constriction of traffic. And, of course, it is difficult to see how the designation or encouragement of Interstate Avenue as a truck route fits together with the creation of an Urban Renewal District which supports housing (gentrification, if you will), and retail, bike, pedestrian and similar amenities. Accordingly, if Interstate is not to be utilized as a principle truck route, some concurrent discussion needs to be held as a part of the current process as to how Interstate MAX affects plans for the separation of automobile and truck traffic.

If truck traffic does continue to pass along I-5, however, the intersection of Interstate and Going will require alterations of a significant magnitude. Plans for financing the project take insufficient account of the costs involved.

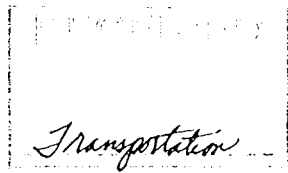
There are no park-and-ride facilities contemplated along the route, except for one of apparent negative value at the Expo Center (in that its use would require crossing the Interstate Bridge by automobile to make use of it). It would seem that an excellent opportunity presents itself to accomplish the purposes of light-rail (the reduction of the use of petroleum-driven vehicles, reduction of congestion, and the improvement of air quality) were secure park-and-ride facilities to be included for use by the types of vehicles (electric cars and shuttles) which Tri-Met proposes to encourage as part of its Three-Year Service Proposal, as well as by bicycles. Major auto companies have recently announced plans to build lighter-bodied vehicles, which could economically be driven by battery. If such vehicles could regularly be used for local trips and for accessing light-rail, the projected statistics relating to the reduction of freeway congestion and air quality problems might be altered to produce a set of projections much more supportive of Interstate MAX as a stand-alone project.

Very truly yours,



Ray D. Sherwood

5254 N.E. 21st Avenue
Portland, Oregon 97211
Tel: (503) 282-1345



RECEIVED

JUN 09 1999

EXECUTIVE OFFICER

June 8, 1999

Vera Katz
Mayor
City of Portland
1220 SW Fifth Avenue
Portland, Oregon 97204

Fred Hansen
General Manager
Tri-Met
4012 SE 17th Avenue
Portland, Oregon 97202

RE: Lloyd District TMA Board of Directors: Position on North Light Rail

Dear Mayor Katz and Mr. Hansen:

The Lloyd District TMA is a private non-profit business association representing major property and business interests in the Lloyd District. On May 6 and June 3, 1999, the TMA Board of Directors met to discuss the proposed Interstate MAX North Light Rail project.

Given the proposal to possibly use Lloyd District/Convention Center urban renewal monies to fund the project (resulting in a reduction/elimination of planned district improvements), the TMA has given serious consideration to the potential impact of the project on the district and its relationship to other district priorities and processes. Outlined below is a summary of the Board discussion and the position taken by the Board as regards this project.

TMA Support for Expanding Regional Light Rail

The Lloyd District TMA has long supported the regional light rail program in the Portland metropolitan area. The need to develop a strong regional rail system continues to be a critical element for growth management, livability and economic vitality. The Lloyd District TMA has strongly supported the Westside MAX project and was actively involved in, and supportive of, the former South/North Light Rail project. The position of the Lloyd District TMA has not changed. The TMA remains strongly in favor of expanding the regional light rail system.

Benefit to the Lloyd District

The TMA Board of Directors finds that the alignment as proposed could be designed to better integrate into the larger transportation needs of the district. Such improvements would benefit district goals and objectives and long-term ridership to and from the Lloyd District for commuters and visitors. We recommend the project team address the following list of concerns as they relate to the issue of benefit for the Lloyd District.

- The alignment does not reinforce the strategic plan goal of concentrating commuter transit access for the district at the 7th/9th & Multnomah transit hub. This hub was adopted by both Tri-Met and the City of Portland as part of the Lloyd District Partnership Plan. Within the Partnership Plan, the goal of bringing direct commuter access to the heart of the employee core was seen as essential to meeting district ridership, mode split, congestion management and economic development objectives.
- The alignment forces a transfer in the Rose Quarter area (near the Interstate Red Lion) for all riders destined for the Lloyd District. This puts those accessing the district at least nine blocks west of the office and retail core. This could significantly affect the attractiveness of transit as a commute mode to the Lloyd District from the north corridor and, as such, overall ridership to the district.
- The transfer at the Rose Quarter results in a walk of approximately 600 feet to the Rose Quarter Transit Center, making transfers to the east extremely inconvenient. The walk distance between this station and the Convention Center also reduces its attractiveness for visitors and conventioners, particularly in inclement weather.
- There is a concern that the alignment would result in the loss of existing, and possibly future, north and or NE bus service that would access the district at the 7th/9th Avenue transit hub.

Recommended Improvements

The TMA Board of Directors offers the following recommendations as they would contribute to mitigating the problems identified with the proposal and bring it more in line with the strategic transportation priorities of the district.

- a. The extension of Fareless Square from Downtown to the Lloyd District should be incorporated as a component of the transportation improvements contained in the North Light Rail package. City approval of a funding package for the North Light Rail project should be contingent upon a full commitment to the Fareless Square extension in September 2000. This would directly address a long-stated district transportation priority and leverage a significant investment being made by the City of Portland (through parking meter revenues) and major district stakeholders who are moving toward implementation of a Business Improvement District (BID).
- b. Tri-Met should commit to a "no net loss of bus service" policy to the Lloyd District. Existing north service should be preserved. Transfers should not be increased over current levels and existing direct route transit lines should be maintained. Also, future bus routes from the north should continue to be pursued to assure commuter access through the NE 7th & Multnomah transit hub.

The Lloyd District is concerned that existing transit service will be routed into the light rail alignment, which will increase transfers and move access away from the adopted transit hub at NE 7th and Multnomah. The district is also concerned that future transit improvements from the north will be ignored or re-prioritized because of the north light rail. Bus routes of initial concern include the #5 and CTRAN's #155. Also of concern is future north direct route service to the district from St. John's, that has been committed to in the Lloyd District Partnership Plan as a component of the PASSport program.

- c. Accelerate Lloyd District and Eliot Neighborhood transit improvements as outlined in the Central City Transit Plan (CCTP) and in the priority recommendations of the Lloyd District Meter Revenue Advisory Committee Report (1997). This would ensure enhanced bus access to the District and Eliot as well as creating direct north/south connections between the Lloyd District, the Central Eastside and residential enclaves with high Lloyd District employment concentrations. This further reinforces development of the NE 7th & Multnomah transit hub in the Lloyd District.

The Lloyd District would also seek from Tri-Met a long-term commitment to the zonal based PASSport program in the Lloyd District. Terms of the program require the district to sell an additional 3,000 passes over the next three years in order to maintain the zonal pricing base now in place. Approximately 5,000 PASSports have been sold since April 1997. The Lloyd District TMA has argued that a requirement to increase PASSport sales by 60% over the next three years will seriously jeopardize a program that has resulted in a 26% reduction in peak hour VMT and a 72% increase in commuter transit ridership in the past year. The Lloyd District PASSport program has contributed significantly to achieving the region's goals for trip reduction, congestion relief, ridership, livability and air quality.

- d. A commitment by the City of Portland to incorporate the I5/Broadway/Weidler improvement project as a priority in its long-term transportation planning efforts. The safety and access problems associated with traffic movement in and out of the Lloyd District, the freeway "weave" problem and access to major regional facilities (i.e. Convention Center, Rose Garden and Lloyd Center) have long been recognized. No project will have a greater impact on the Lloyd District's ability to respond to growth, serve as a convention and entertainment destination and meet the City and Metro's adopted employment growth objectives than the package of improvements associated with the I5/Broadway/Weidler project. The City can begin the process by committing to the project as a transportation priority that has both local and regional implications.

Secondly, immediate initiation of the Lloyd District/Rose Quarter Improvement Plan study process will serve as a foundation for understanding the complexity of the problems associated with this corridor. It will also provide for a clear picture of the component parts of the solution that can be addressed with local, regional, state and federal funding.

Urban Renewal Funds

The City should recognize the role that urban renewal funds play in the economic development of a district like the Lloyd District. The Lloyd District is targeted to grow an additional 16,000 jobs, become an emerging housing area and serve as a gateway to both the Central City and to convention and entertainment trade for the region. Recent growth in the Lloyd District, and planned growth in the future, will contribute immensely to meeting the region's 2040 Plan for Growth. The urban renewal projects being considered for reduction or elimination to make room for the north light rail maintain a clear and direct relationship to the economic development priorities of the district. Urban renewal funds are integral to achieve these ends. Use of such funds for projects not on the identified priority list requires serious consideration of the Lloyd District vision, its strategic plan goals and the relationship of such projects to the economic vitality of the district.

As to the issue of support for possibly redirecting up to \$10 million of Lloyd District/Convention Center urban renewal funds for the North Light Rail project, the TMA Board of Directors would offer the following:

- a. We recognize at this time that the City is considering use of between \$1 million and \$10 million from the Lloyd District/Convention Center urban renewal fund. Use of these funds for light rail must first come with a clear delineation of the benefits the North Light Rail project will have for the entire district as contrasted to those projects being reduced, deferred or eliminated. The Lloyd District TMA would request a written description of the direct benefits the North Light Rail alignment will have for the Lloyd District as regards economic development and compatibility with established district economic development and transportation priorities.
- b. The City must commit to a cap of \$10 million from the fund. Anything above this amount could seriously jeopardize essential district improvements.
- c. The recommendations outlined in section 3, above, must be provided. These recommendations address flaws associated with the alignment, result in a direct benefit to the district and address adopted district priorities for economic development and transportation.
- d. The cuts in urban renewal projects must correspond to those recommended by PDC staff and must reflect a fair distribution between the Lloyd District/Convention Center area itself and for the area of MLK/Alberta north of Broadway. The May 10, 1999 PDC draft staff recommendation allocates cuts/reductions between projects targeted for both these areas totaling \$10 million. The ratio of cuts is approximately 80% to Lloyd District projects and 20% to MLK area projects. Given that approximately 95% of the revenues derived from the urban renewal district come from the area south of Broadway, the TMA believes PDC staff's recommended cuts/reductions are acceptable. Any use of these funds, up to \$10 million dollars, should reflect this distribution.
- e. Monies left in the urban renewal fund, after an allocation is made to the North Light Rail project, need to be directed to projects and priorities established by the community at initiation of the urban renewal district. In the future, requests to alter allocation of urban renewal funds to new projects, which would alter priorities or necessitate reprioritization, should be dealt with through a community process involving the stakeholders within the urban renewal zone.

Overall, the TMA Board of Directors can support the use of urban renewal funds for the North Light Rail project. However, the issue of benefit to the district must be addressed directly and objectively. Also, the TMA's outline of recommended improvements must be provided to assure that the light rail alignment is integrated into the larger package of transportation and economic development programs and processes underway in the Lloyd District.

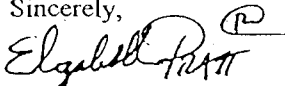
General Comment

The Lloyd District TMA would request that a cost estimate for linking the north alignment to the Banfield alignment to allow for operating service between North Portland and destinations to the east be developed. The fact that the proposed north alignment does not allow for eastbound passenger access is concerning. Connections to the east and to the future airport extension will require a transfer, which will likely affect ridership. The cost of adding the link should at least be understood and engineering should allow for future operating service to the eastbound line.

In the context of the concerns and recommendations outlined in this letter, the Lloyd District TMA supports the North Light Rail extension. Our recommendations, particularly as they relate to the expenditure of Lloyd District/Convention Center urban renewal funds, will improve the alignment's integration into a larger vision and package of programs and services for the Lloyd District and the region.

Please keep us abreast of the issues related to this project. We appreciate your time in reviewing our position and look forward to hearing from you and the project team.

Sincerely,



Elizabeth Pratt
Chair, Lloyd District TMA

Cc: Charlie Hales, Commissioner
Jim Francesconi, Commissioner
Eric Sten, Commissioner
Dan Saltzman, Commissioner
Rod Monroe, Metro
Ed Washington, Metro
David Bragdon, Metro
Mike Burton, Metro
Marty Brantley, Portland Development Commission
George Passadore, Tri-Met Board of Directors
Don McClave, Tri-Met Board of Directors
Bob Stacey, Tri-Met
Virgil Ovall, Chair, Lloyd District Community Association
Hank Ashforth, Chair, Lloyd District BID Stakeholders Group

Bob Peterson

2036 N Skidmore Court ~ Portland, Oregon 97217
Fax 249-1388 ~ Home Phone 249-0102

June 13, 1999

Ross Roberts
Metro Transportation Dept.

Via Fax 797-1929

Dear Mr. Roberts,

I am writing to express my concerns regarding the Interstate Max light rail alignment and the process of public involvement.

This is moving much too fast and the concerns that I and others that I have talked with have not been answered. Nor has the process been scheduled so that I could speak. The JPAC meeting that occurred June 1st., was on the same night that I chaired the board meeting of the Overlook Neighborhood Association. Now I see that the Portland City Council meeting is on the same night of the Overlook Neighborhood Association general membership meeting, which I also chair. My neighborhood meetings have been held on the first and third Tuesday of the month for at least the last seven years. This raises the idea that you and others are trying to minimize the input from the people who live and are active in this section of the Interstate Max line, by scheduling these meetings on the same days.

During the years that Metro held their many meetings, I and others alerted Metro of the many problems that the South/North rail line would have on the southern portion of the Overlook neighborhood if the all Interstate Avenue alignment were chosen.

The Metro Regional Services listened, studied, and decided that the LPS, or Locally Preferred Strategy was to recommend that light rail not run on Interstate Avenue in this southern section (south of Alberta Street to the Kaiser Clinics). Those concerns and problems are still present, and include but not limited to;

Noise- this section has no noise barriers along the I-5 freeway to the east and on the west is the Albina rail switching yard.

Kaiser Clinics- there are four clinics grouped together in this southern portion and an emergency center, employ 800, HMO members make hundreds of trips daily, and 80% come from the north using the I-5 freeway exits

Access- to our homes, to the services at the Kaiser clinics (including emergencies), police and fire vehicles into the neighborhood for the safety of us who live and work there.

Traffic- the access on and off of Swan Island via Going Street is of major concern, with 13,000 jobs on Swan Island, Interstate Max impact problems have not been answered

Transit- this does not serve those of us who live here, current bus service stops every two blocks, Interstate Max stops every half mile, this results in less ridership from those who live in the neighborhoods that light rail goes through.

Housing-with Interstate Max comes changes in the Albina Community Plan that includes higher density housing, more people means more cars and this light rail plan is eliminating traffic lanes.

Interstate Max is proposed because it is suppose to help relieve traffic congestion. This all Interstate route will not protect residential areas from impacts of through-traffic, which is an objective in the Transportation Policy in the Albina Community Plan.

The Albina Community Plan also states in its Environmental Values Objectives "Improve water quality and enhance fish and wildlife habitats. Protect wetlands and water features". The Interstate Max line would require 0.93 acres of wetlands to be filled. So this too goes against the objectives of the Albina Community Plan. Another objective under Environmental Values "Reduce environmental impacts such as litter and noise". The SDEIS states the noise levels would raise in the area of Overlook Park, with no impact to the park, but what about the people in the park who would not like the additional decibels of noise created by light rail.

I was a listed supporter of the South/North light rail in the Oregon's Voter Pamphlet, and still believe light rail would be good for the city--BUT--This newest idea is not, I must again say, IT IS NOT a good alignment .

The City of Portland's Comprehensive Plan Policy 2.25 reads

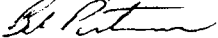
2.25 Albina Community Plan

Promote the economic, Historic character and livability of inner north and inner northeast Portland by including the Albine Community Plan as a part of this Comprehensive Plan .

One objective under Urban Design Goal and Policies of the Albina Community Plan, says in part "Preserve and enhance the character of Portland's neighborhoods". An open tie-and-ballast design will not preserve or enhance the livability of my neighborhood.

When we build light rail in North Portland, let's do it the right way. Don't try to just grab the Federal Dollars and build it wrong. This will create more problems then it will remove.

Sincerely,



Bob Peterson

cc: Interstate MAX Office 5101 N. Interstate Ave.

PS Please forward this to any others seeking public comment and input



United States Department of the Interior

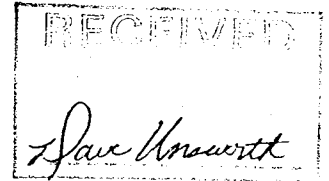
FISH AND WILDLIFE SERVICE

Oregon State Office

2600 S.E. 98th Avenue, Suite 100

Portland, Oregon 97266

(503) 231-6179 FAX: (503) 231-6195



Reply To: 7734.001
File Name: ER99-411.wpd

June 3, 1999

Ms. Helen Knoll
Regional Administrator
Federal Transit Administration
Region X
Jackson Federal Building, Suite 3142
915 Second Avenue
Seattle, Washington 97174

RE: DSEIS for South/North Corridor Project

Dear Ms. Knoll;

The Fish and Wildlife Service (Service) received your request to review the above referenced document on May 17, 1999. The Service has reviewed the Supplemental Draft Environmental Impact Statement (DSEIS) for fish and wildlife impacts associated with the new light rail alternative between the Rose Quarter and Expo Center.

Even though the document states the subject area between Rose Garden and Kenton is "highly urbanized and includes commercial, residential and industrial land uses with very little vegetation or natural habitat", the Service feels there is opportunity enhance the urban environment by providing naturalized vegetative features to the design. In addition, the Service has the following comments:

1. The Service remains concerned about the potential impacts of the proposed alignment to the wooded wetland designated as "Wetland K", and is willing to participate in future discussions to avoid or minimize impacts to jurisdictional wetlands and water crossings associated with the corridor. Federally listed species that may occur in these areas include: Aleutian Canada goose, bald eagle, Howellia, Bradshaw's lomatium, and Nelson's checker-mallow.
2. In the event the new Full-Interstate Alignment Alternative is selected, in-water construction to replace existing footings in Columbia Slough for a reconstructed N Denver Avenue viaduct would affect the habitat of threatened, endangered or listed species. Federally listed species that may occur in suitable habitat available in Columbia Slough include: steelhead, chum and chinook salmon. When the revised designs have been completed the Service will review and

update the submittal, as well as the previously prepared Biological Assessment for the appropriate BMP's.

Thank you for the opportunity to review the DSEIS for the South/North Corridor Project at this time. The Service reserves the right to provide further comment on project designs and submittals as they become available for review.

Sincerely,

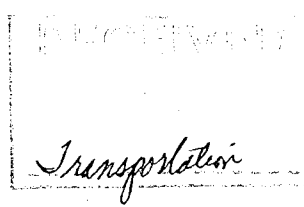


for Russell D. Peterson
Supervisor
Oregon State Office

cc: EPA
ODFW
NPS
Metro

June 4, 1999

Metro Executive Officer Mike Burton
Metro
600 NE Grand Avenue
Portland, Oregon 97232-2736



RECEIVED

JUN 10 1999

EXECUTIVE OFFICER

Dear Councilman Burton:

On behalf of the Bridgeton Neighborhood Association I would like to request your support of MAX and a light rail line to the Expo Center of North Portland.

The Bridgeton neighborhood in it's Neighborhood Plan (adopted by the Portland City Council in November 1998) has a light rail stop at the Expo center as a central component of the neighborhood's Transportation Plan as well as a key component of the Bridgeton neighborhood's Vision Statement.

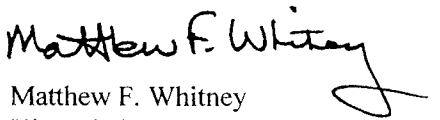
Through an exhaustive two year effort the Bridgeton neighborhood overwhelmingly approved a neighborhood plan that sought to help Bridgeton to develop into a "vital, environmentally sensitive, pedestrian-oriented river community". The Bridgeton neighborhood's Vision Statement calls for building a "village like character" to the neighborhood and in order to promote alternatives to cars, "a pedestrian and bicycle promenade, (connecting along the riverbank to) a nearby light rail stop which includes bike lockers to support energy-efficient commuting."

Since adoption of our neighborhood plan our neighborhood has seen a tremendous amount of growth and new development. In the past two years more than 50 new row houses have been built and occupied along Bridgeton Road. Currently a condominium and apartment development on the west end, and within ¼ mile of the future Expo Center MAX station, is nearing completion. This new complex will add an additional 70 condos and 140 apartments plus a 110 room hotel to the neighborhood. An additional 180 unit condominium and a second 100 room hotel are also planned for this site. Overall, the Bridgeton Neighborhood will see a population growth exceeding 500% within the next two years!

In light of this ongoing development and expected population growth you can surely understand why the neighborhood in it's Neighborhood Plan put such an emphasis on the importance of a MAX line to the Expo Center. If Portland is to become a livable 21st century city and the Bridgeton neighborhood an inviting place to live, then a MAX light rail connection is absolutely necessary.

The Bridgeton Neighborhood requests your strong support for building a MAX line to the Expo Center.

Sincerely,


Matthew F. Whitney
Vice-Chair
Bridgeton Neighborhood Association
417 North Bridgeton Road
Portland, Oregon 97217-8009

RECEIVED

JUN 14 1999

June 11, 1999

Mr. Ross Roberts
Metro Transportation Dept.
600 NE Grand Ave.
Portland, OR 97232

Dear Sir:

The mother of all traffic jams! That's what will happen daily if Interstate Ave is plugged with light rail and there's an accident on I-5.

How can any intelligent person deliberately destroy a thoroughfare that is the #1 alternate to the freeway, not to mention the constant need by police, fire, ambulance and the locals? It is critical as an evacuation route.

You want to take away our perfect bus service that stops every 2 blocks & replace it with something that only stops every 1/2 mile and doesn't even go anywhere. After we hike to a station we would have to transfer to a bus; therefore, those of us who have used bus service all our lives will be driving everywhere instead.

Clark County (C-Tran) has been furnishing express bus service between Vancouver & Portland via I-5 for many years, making light rail unnecessary. If you must spend millions of dollars, use it on the airport leg.

Sincerely,

Neva M. Wulf

Neva M. Wulf
1519 N. Jarrett Street
Portland, Oregon 97217

PIEDMONT

Neighborhood of the Year — 1991 Spirit of Portland Awards

June 12, 1999

PNA
PO Box 5914
Portland OR 97228

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1999 - 2000

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283-2360

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Barbara Fisher
735-2681

Nuisances
Gretchen Dennison
735-2681

Rosemont Land Use Review
Tom Markgraf, Chair
285-9549

Ross Roberts
Metro Transportation Department
600 N.E. Grand Avenue
Portland, OR 97232

Re: Interstate Light Rail Project

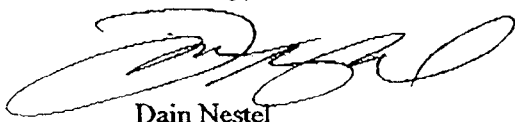
Dear Mr. Roberts,

The Piedmont Neighborhood Association Board would like to inform you that we support the continued planning of the Interstate Avenue Light Rail project. We understand the benefits of light rail but because this is a new, fast moving project we have concerns which we feel should be addressed and resolved as the planning process moves forward.

- 1) Bus service in the North / Northeast Portland neighborhoods should not be negatively impacted by light rail.
- 2) Feeder bus lines servicing neighbors outside of the three block corridor should be implemented to provide access to IMAX.
- 3) Displacement of traffic off of Interstate and I-5 through neighborhoods, as a result of light rail, needs to be addressed so mitigation strategies can be devised.
- 4) Congestion on Going and Interstate (east and west) is projected to get worse with light rail. The severity of the congested should be minimized as much as possible so that commuter and commercial traffic is not heavily impacted.
- 5) The Fred Meyer at Lombard and Interstate may become an unintended light rail Park and Ride which should be prevented.
- 6) There are a lot of questions and concerns our neighbors have thus the neighbors and neighborhood associations must kept informed of the progress in this planning process.

Thank you for your consideration.

Sincerely,



Dain Nestel
Piedmont Neighborhood Association, Parks Chair

The Emerald Neighborhood — In N & NE Portland

June 12, 1999

Ross Roberts
Metro Transportation Department
600 N.E. Grand Avenue
Portland, OR 97232

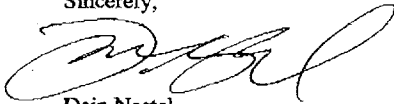
Re: Interstate Light Rail Project

Dear Mr. Roberts,

I would like to voice my support for Interstate Light Rail. I feel this is a transportation alternative that will benefit the North and Northeast Portland neighborhoods on many levels. Portland had the foresight to create an Urban Growth Boundry to prevent urban sprawl which, by design, is creating a more dense city. As this density increases more vehicles are being garaged and used on our already crowded streets. Portland must make the next investment in its future by creating more transportation alternatives while also enhancing current transit services. Light Rail is that step. Additionally I support a means of transport that is environmentally friendly and does not contribute to the deterioration of our air quality.

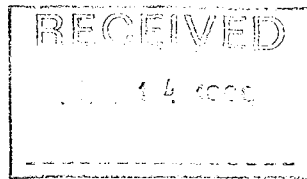
I hope my support of IMAX will help us make this light rail project a reality.

Sincerely,



Dain Nestel
839 N. Buffalo Street
Portland, OR 97217
503-735-0784

JUNE A. ROBERTS



4016 N. CASTLE
PORTLAND, OREGON 97227
284-3675

8 June 1999

Ross Roberts
Metro - 600 N.E. Grand Avenue
Portland OR 97232

SUBJECT: North Interstate Light Rail

I was a member of the North Light Rail Committee since the study first started in 1991. We attended meetings, joined committees, wrote letters, made telephone calls and discussed at length the effect light rail would have on our area.

Although the route has changed since originally started, the situation has not changed. There are still fatal flaws in the proposed plan which will have a disastrous effect on the liveability of the residents of our area.

We discussed at length the suggestion to change Interstate from its four lanes to two. It was the emphatic consensus that, from a safety standpoint, Interstate would have to remain four lanes. Overlook is an "island" with 480+ residences entirely dependent on Interstate for access to the rest of the city. By no stretch of the imagination could two lanes on Interstate satisfy specifications of an impact statement.

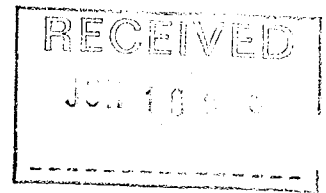
Bus #5 presently provides 20 stops along Interstate and goes to the Jantzen Shopping Center. The 7 stops suggested for light rail would mean that many people would have to walk as many as 15 blocks to public transportation. Ride the #5 bus and note the families with small children, elderly people loaded with groceries, students and others going to work. Are they going to be able to walk 15 blocks to public transportation? I think not!

Bus #5 provides a direct route from the Jantzen Shopping Center to downtown Portland. The proposed light rail would require a transfer at the Rose Quarter. This will make Tri Met ridership look tremendous as you will have double the number of people floating around trying to find transfer to another means of transportation to complete their rides.

Do you realize how ridiculous it is to see "officials" sitting on a Max line, grinning from ear to ear, saying how wonderful the ride is? Such advertisements are an insult to our intelligence and only show that you know nothing about the citizens of Portland. Witness the voter turndown!!!

I know what is going to happen. Interstate light rail is going to go the same direction as installation of wheelchair ramps in the Overlook a few years back. When the whole curb of the corner of Castle and Shaver streets was torn up and two ramps 4 feet apart were put down (one facing south and the other facing west) we protested vehemently. To our amazement the City "person" (business suit and clipboard) told us that funding had been appropriated and had to be spent and that was the easiest way to use up the money. Most of the other curbs in our neighborhood remained untouched. Our sidewalk now floods unless I (age 77) keep the gutter cleared.

"No one is more definite about the solution than the one who doesn't understand the problem." Robert Half



June 2, 1999

Mr. Ross Roberts
Metro Transportation Department
600 NE Grand Avenue
Portland, OR 97232

Dear Mr. Roberts:

We are writing in support of the proposed Interstate Max proposal. While the North segment on last November's ballot was difficult to rally around, this proposal seems to remedy some of the concerns and is one we now support. It sounds like an exciting possibility for North Portland and one that will be immediately beneficial for our family. We would like to make a special request for the inclusion of bicycle-friendly features into the design of the new Max line.

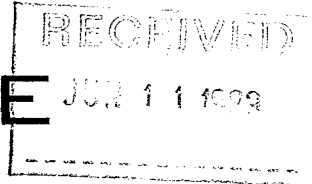
Please share this letter with relevant government officials who need to know our opinion on the matter. Good luck in your efforts and we look forward to taking a ride!

Two handwritten signatures in cursive script. The first signature is "Christopher Sheesley" and the second is "Genevieve Sheesley".

Christopher & Genevieve Sheesley
6639 NE Rodney Avenue
Portland, OR 97211

TRANSFER ONLINE

227 SW PINE STREET...SUITE 300...PORTLAND, OR 97204
503.227.2950...FAX 503.227.6874
WWW.TRANSFERONLINE.COM...E-MAIL INQUIRY@TRANSFERONLINE.COM



FACSIMILE TRANSMITTAL SHEET

TO:	FROM:
Ross Roberts	Regina Beckett
COMPANY:	DATE:
Metrol Transportation	6-10-99
FAX NUMBER:	TOTAL NO. OF PAGES INCLUDING COVER:
797-1929	only
PHONE NUMBER:	SENDER'S REFERENCE NUMBER:
RE:	YOUR REFERENCE NUMBER:
Interstate Max	

☐ URGENT ☐ FOR REVIEW ☐ PLEASE COMMENT ☐ PLEASE REPLY ☐ PLEASE RECYCLE

Mr. Ross Roberts:

I am responding to the proposal for the max line route from the Rose quarter to the Expo Center, I think this would be so GREAT!!

I live in the north area neighborhood where the bus service is not that reliable or frequent ; it can take one hour to get anywhere as to taking fifteen to twenty minutes by driving. Therefore I drive to work, if there was the alternative of the max line, I would be riding.

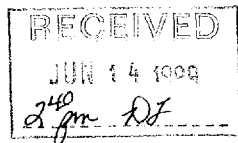
Also I have attended events at the expo center and the traffic jams are horrendous, the additional transit support would be such an asset.

Please let me know of additional meetings and how this proposal is progressing.

Sincerely, Regina Beckett

Polish Library Building Association

3832 N. Interstate Av.
PORTLAND, OR 97227
Phone 503 287-4077



Sunday, June 13, 1999

Ross Roberts
Metro Transportation Department
600 NE Grand Ave.
Portland, OR 97232

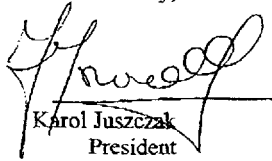
Dear Mr. Roberts:

Plan that was presented for review at Kaiser Town Hall did not address several issues in detail. Please take our comments for Interstate Max under consideration.

1. Parking on N. Interstate Avenue. How many parking places are there going to be and where on N. Interstate Avenue between Overlook Park and N. Skidmore? Currently there is street parking between N. Failing and N. Skidmore.
2. Effect of Light rail on Polish Library and St. Stanislaus Church building foundations. How will those buildings be protected against Light Rail vibrations? Will there be special cushions installed?
3. Overpass on N. Failing safety and crime. When the overpass will reopened again will there be an increase of crime in the neighborhood? The area by the overpass needs to be well lit. We would like old fashion streetlights to be like they are in down town on 5th Avenue.
4. Street safety and children. Children are using the Overlook Park for various activities how will the children be protected against light rail. We have Polish school on Saturdays during school year and around 60 children attend. How will they be protected against light rail?

Please include us in discussions and planning on the Overlook Park to N. Skidmore part of light rail before final design is presented. We look forward working with you on those issues.

Sincerely,

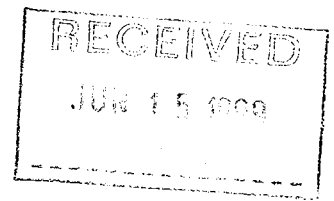


Karol Juszcak
President
503 289-2466



Port of Portland

Box 3529, Portland, Oregon 97208, U.S.A.
503/231-5000



June 14, 1999

Fred Hansen
Executive Director
Tri-Met
4012 SE 17th Avenue
Portland, OR 97202

Re: Interstate MAX Supplemental Draft Environmental Impact Statement

Dear Fred:

As a fellow transportation provider and partner in the I-5 Trade Corridor, we applaud Tri-Met and the business committee's efforts to identify a north light rail transit (LRT) option that is less expensive and meets many of the region's 2040 goals. The existing and projected transportation problems in the north and northeast portion of the city warrant a strong viable alternative to the automobile, which the Interstate MAX project will provide.

As you know, transportation mobility in the I-5 corridor and surrounding transportation system is of particular interest to the Port of Portland and the shippers we represent. Port facilities are located on either side of I-5 and improved access from I-5 to our marine gateways via Marine Drive is and will continue to be a key strategic interest.

Marine Drive is the primary access to the region and State's only international container facility as well as bulk terminal facilities. The Port, City of Portland and State of Oregon have invested significant resources to ensure transportation access and mobility to this facility is maintained. Marine Drive is designated as part of the National Highway System and a freight route on the region's transportation system plan. Our own traffic analysis show Marine Drive reaching failure today for northbound access to I-5. Future traffic forecasts show significant traffic delay at that interchange.

Given the critical importance of access to Marine Drive, the proposal to include a park and ride at Expo Center as part of the Interstate MAX project is of concern to us because of the added automobile traffic to the Marine Drive interchange. Frankly, I'm concerned that the additional traffic from the park and ride will force container traffic to pursue other routes or other ports.

Another area of potential concern for the Port will be the alignment for the proposed Interstate MAX. If the alignment moves to the east, it may impact the Radio Tower site, the property just south of the Expo Center, which the Port recently purchased for wetland mitigation.

Fred Hansen
June 14, 1999
Page 2

We look forward to working collaboratively with you on solutions to these areas of concern as part of the Interstate MAX environmental impact statement process. Please let us know how we can offer further support on this project as it moves forward.

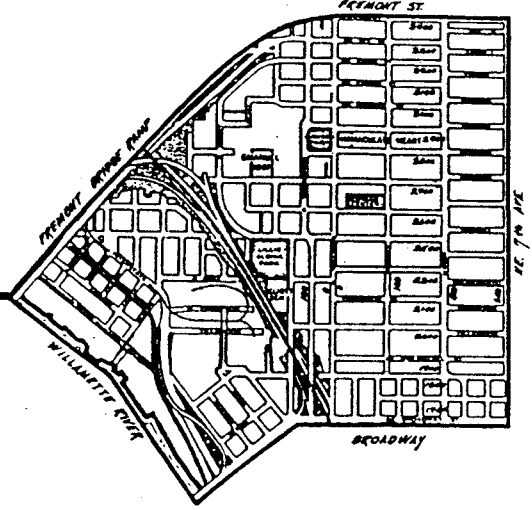
Yours very truly,

A handwritten signature in cursive script that reads "Mike".

Mike Thorne
Executive Director

c: Ross Roberts, Metro
Dave Lohman, Port
Susie Lahsene, Port

ELIOT NEIGHBORHOOD ASSOCIATION



June 9, 1999 *ADR*
~~July 1, 1995~~

Ross Roberts
Metro Transportation Department
600 NE Grand Ave
Portland, OR 97232

Dear Mr. Roberts

On May 11th, 1999, a joint meeting of the Eliot Neighborhood Association's Board and Land Use Committee was held on the Interstate Light Rail proposal and the SDEIS.

The most radical change in the Interstate proposal is the part of the alignment through the Eliot neighborhood. A change that was not explored with Eliot before being announced to the general public.

The proposed route fails to serve Eliot's core residential area and the high density zoning created for a light rail route by the Albina Community Plan along Flint Avenue. It also fails to serve Emanuel Hospital and the Broadway Weidler corridor.

Instead, it has a station at Russell where it will serve two taverns, a handful of residents, and an already built-out industrial sanctuary, and it will cause problems for the flow of freight in the area. High density residential and retail is forbidden in lower Albina by the zoning. The type of businesses and traffic flows were such that the Lower Albina district was barely discussed in the Central City Transportation Management Plan.

Therefore the Eliot Neighborhood's position is that if the proposed light rail from the Rose Quarter to Expo Center along Interstate Avenue is, the following stipulation must be met:

1. Tri-Met does not use any money for the route from Oregon Convention Urban Renewal funds.
2. Existing truck access must be preserved to the lower Albina area, and the proposed overcrossing must be built before starting construction on light rail.
3. The existing through bus routes in the Eliot neighborhood must be kept.
4. Pedestrian access and environment from the station along Russell up under the freeway must be improved.
5. A feeder bus/shuttle shall be implemented along Russell that provides service to the hospital and Eliot's core residential area.
6. There must be ongoing community involvement in the detailed planning process for the light rail project.

Sincerely,

Dari Buckner

Dari Buckner
ENDA Chair
Interstate Brands
POB 12165
Portland, OR 97212
503-287-1114

Steven D. Rogers
Steven D. Rogers
ENDA Land Use Chair
533 NE Brazee
Portland, OR 97212
503-281-1799

cc Portland City Council
Tri-Met Board

June 11, 1999

Metro Transportation Department
600 NE Grand Avenue
Portland, OR 97232
Attention: Mr. Ross Roberts

Dear Mr. Roberts:

I write to you to express my views regarding the proposed IMAX alignment. There are a number of issues surrounding the construction of this segment of light rail that have not had sufficient public debate, the most important one is the cost of the LRT. At \$60,000,000 per mile, the LRT system compares unfavorably with the Bus Rapid Transit system proposed for the southern segment of the South-North alignment. Lane Transit District also has a grant proposal submitted to the FTA for a BRT system, in which the entire 10-mile alignment, including vehicles, improved stations, and park-and-ride lots, costs \$44,750,000. I believe quite strongly that there should be an open and public debate about the costs and benefits of the two systems, which has not heretofore taken place. One of the clearest lessons yet to be learned from the last election defeat of the light rail bond measure is that publicly-financed light rail is dead for the near future. This is acknowledged in the proposal submitted by Tri-Met to the FTA for consideration in the Bus Rapid Transit Demonstration Program, and is worth quoting. "Light rail transit will continue to be a part of the regional strategy to service major corridors, but it may not be cost effective (sic) to build rail to all the (sic) places that will need transit-oriented intensification. Interim strategies will be needed in some potential rail corridors where we cannot afford to build light rail in the near future. Interim transit strategies are needed that emulate light rail transit's speed and attractiveness without its higher capital costs."

My question is: If the BRT system makes sense for the 99E corridor, why does it not make sense for North Portland as well? One of the most common statements made by officials from Tri-Met and the City of Portland is that light-rail affords a permanence that busses do not, and therefore light rail is the preferred choice to create viable TODs. There are two things wrong with this argument. One is that there is absolutely no hard data to prove the above-stated assertion, only anecdotal evidence from developers. I would like to see a detailed study that proves this assertion. The second problem with this argument is that a BRT that runs partially or completely on a fixed guideway, with improved station stops, would be just as permanent as a light rail system, but would cost 1/12th as much.

There are a number of reasons why the light rail option should be shunted off into a siding in favor of a Bus Rapid Transit system.

- Lower capital costs;
- Lower operating costs;
- Higher passenger capacity: On the main north-south line in Curitiba, Brazil, the system carries 20,000 people per hour on 45-second headways using bi-articulated

busses capable of carrying 300 people. Only now are the city transportation planners looking at a light rail system; and

- More flexible system architecture.

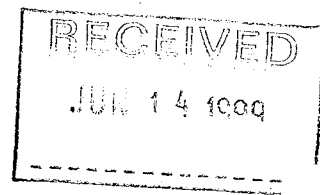
On the financing side of the equation, the BRT system could be built without any federal funds whatsoever. With the money allocated by JPACT, the City, and Tri-Met, the entire alignment from Expo Center to Milwaukee could be built, including vehicles and stations. Moreover, without federal money, Portland would be free to choose the more advanced Mercedes, Volvo, or Renault busses available in Europe. One of the most exciting possibilities of the BRT system, if constructed and marketed properly, is that for the first time in North America there would be a bus system that attains all of the transit and land-use goals set for light rail, but at a fraction of the cost.

Light rail was defeated twice at the ballot box, and many people smell a fix with this current IMAX proposal. I would respectfully submit to you and the Metro councilors that the costs and benefits of the LRT vs. the BRT should be weighed in a public fashion. Then allow the community at large to decide the best system based upon a full and open disclosure of all of the considerations.

Sincerely,



Patrick Driscoll
5022 NE 27th Avenue
Portland, OR 97211
(503) 493-1224



Transportation Dept.
Interstate Max
600 N.E. Grand Ave.
Portland, Or 97232-2736

June 9, 1999

To Whom It May Concern:

Subject: Light rail on Interstate Ave.

We have lived on Minnesota Ave for over 10 years, and have been very concerned about the increased traffic on Interstate Ave. Interstate Ave is the main and only North/South thoroughfare for many in the Overlook Neighborhood.

The resulting construction on Interstate Ave will only add to our already congested highway and leave most of us with only side streets as an option for travel. The prospect of so many people trying to find a faster route on side streets will surely cause increased accidents, injuries and/or death at uncontrolled residential cross streets and will endanger our children at play.

The construction that we just dealt with recently caused all kinds of problems, especially at the Going Street Intersection, where we were forced to wait for 2 or 3 light changes before proceeding through. This is also true when turning north from Going Street. When construction was underway I was waiting in line at Going Street for the Alberta Street light to change. What do we, the Tax Paying Citizens get after the construction of the light rail? A 4 way Interstate, reduced to a 2 Way Street which will result in total gridlock, especially at rush hour.

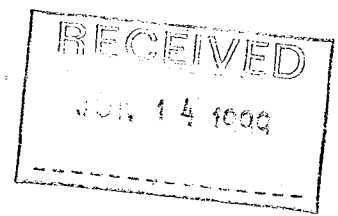
I refuse to believe that all this construction, Gridlock and inconveniences, for a few riders that want to travel to Kenton, is really worth all this trouble and money. I am sure this is Big Business at our expense, and we the little people would like a voice in this matter.

THIS IS A **NO** VOTE FOR LIGHT RAIL ON INTERSTATE AVE.

SINCERELY

Bree Forbish

5225 N. Minnesota



Transportation Dept.
Interstate Max
600 N.E. Grand Ave.
Portland, Or 97232-2736

June 9, 1999

To Whom It May Concern:

Subject: Light rail on Interstate Ave.

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I refuse to believe that all this construction, Gridlock and inconveniences, for a few riders that want to travel to Kenton, is really worth all this trouble and money. I am sure this is Big Business at our expense, and we the little people would like a voice in this matter.

THIS IS A **NO** VOTE FOR LIGHT RAIL ON INTERSTATE AVE.

SINCERELY

Joni Forbush

RECEIVED

JUN 14 1999

Transportation Dept.
Interstate Max
600 N.E. Grand Ave.
Portland, Or 97232-2736

June 10, 1999

To Whom It May Concern:

Subject: Light rail on Interstate Ave.

We have lived on Montana Ave for over 20 years, and have been very concerned about the increased traffic on Interstate Ave. Interstate Ave is the main and only North/South thoroughfare for many in the Overlook Neighborhood.

The resulting construction on Interstate Ave will only add to our already congested highway and leave most of us with only side streets as an option for travel. The prospect of so many people trying to find a faster route on side streets will surely cause increased accidents, injuries and/or death at uncontrolled residential cross streets and will endanger our children at play.

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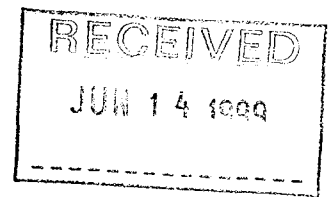
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THIS IS A **NO** VOTE FOR LIGHT RAIL ON INTERSTATE AVE.

SINCERELY



Brent Cope



June 9, 1999

Transportation Dept.
Interstate Max
600 N.E. Grand Ave.
Portland, Or 97232-2736

To Whom It May Concern:

Subject: Light rail on Interstate Ave.

I have worked for Union Pacific for over 20 years, and have been very concerned about the increased traffic on Interstate Ave. Interstate Ave is the main and only North/South thoroughfare for many going to and from work. The resulting construction on Interstate Ave will only add to our already congested highway and leave most of us with only side streets as an option for travel. The prospect of so many people trying to find a faster route on side streets will surely cause increased accidents, injuries and/or death at uncontrolled residential cross streets and will endanger children at play.

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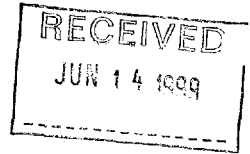
THIS IS A **NO** VOTE FOR LIGHT RAIL ON INTERSTATE AVE.

SINCERELY,

Tuesday, June 01, 1999

To:

Ross Roberts, Metro Transportation Department
600 NE Grand Ave
Portland Oregon 97232



Re: North Interstate Light Rail Project SDEIS

I was assembling my remarks for today's hearing when I saw Councilor Ed Washington's editorial in this morning's Oregonian. After reading it I can only say that I agree with his viewpoint and I encourage you to read it as well.

Light rail is only one part of the region's transportation plan but it is a necessary and essential part of the regional transportation plan. Without an expanded light rail system this city's and this region's unique and effective transportation strategy cannot work.

I can say with confidence that there is no one in this room and probably no one in this region, who believes that light rail is the only transportation project that is needed. It is only the opponents of light rail who attempt to isolate it by separating it from the larger context of transportation planning and project construction.

The real issue here is that Portland is unique, thanks in large part to our transportation and land-use planning visions and successes.

But there are people who resent our uniqueness -- some of them are here today -- people who will do almost anything to bring Portland down to a substandard and ordinary level of livability and accessibility which is unacceptable here, but which is accepted by default as the norm by nearly all other cities in the country.

We here in Portland know that we do not need to settle for, or accept by default, the substandard or the ordinary.

I for one will keep working, along with the hundreds of others you've heard from in this and other decision-making processes, to make sure that we don't give up on the good transportation ideas which have made Portland unique.

The North Interstate Light Rail Project is one of these good transportation ideas. And many of us will be working all summer to make this an even better community project. As for today, I have carefully reviewed the SDEIS and I urge your adoption of this study. I will keep working to maintain and improve Portland's unique character and livability through this process and through the ongoing expansion of light rail as part of our regional transportation network.

I encourage Metro's, Tri-Met's and the City of Portland's continued efforts in support of the North Interstate Light Rail Project as an essential component of the city's and the region's growing transportation system.

Sincerely,

Steve Fosler
138 NE Stafford Street

Encl.

FOSLER

portland

architecture

503.241.9339

• STEVE FOSLER, REGISTERED ARCHITECT • THE GALLERIA 401 • 600 SW 10TH AVENUE • PORTLAND OREGON 97205-2734 • PH: 503.241.9339 • FAX: 503.220.0754 • MAX: GALLERIA STATION

RECEIVED
JUN 14 1999



IN RESPONSE

Ed Washington

People's will drives MAX in Portland

Do you want to know why the light-rail idea is back on track? Because the people put it there. Not governments. Not politicians. Not planners. It was the people.

Critics claim that the new, shorter, more economical north light-rail line proposal is just some back-door, back-handed attempt by local leaders to force citizens to accept a "boondoggle" by "fiat" ("It's time for region to stop MAX in its tracks," May 26). They claim that officials at Metro, Tri-Met and the city of Portland are trying to sneak some "nasty little secret" by the people of this region. They claim that we are trying to veto the will of the voters.

Let me tell you: The only people trying to sneak anything by you are those critics with their misinformation, misstatements and mean-spirited assaults. The truth is that voters in North Portland have approved a light-rail project three times: in 1994, in 1996 and in 1998. During that last election, 55 percent of the voters who live within a half-mile of either side of the Interstate MAX alignment voted for light rail. Add to that the fact that in Multnomah County overall, the light-rail project passed by 52 percent.

After the defeat of the funding measure for the south-north light-rail line last year, I, as chairman of Metro's Transportation Committee, called for a series of open forums. I invited elected leaders from all over the region. We wanted to know exactly what it is that you want, what you don't want and for what you would be willing to pay. Do you know what we found out? That many people who voted against the funding think light rail is a valuable tool for our transportation system. They voted against that one particular funding plan because they thought it cost too much or it displaced too many people.

We, as a region, could have taken the easy way out. We could have thrown up our hands and accepted the defeat as a sign that people were OK with longer commutes, more traffic tie-ups on I-5, more cars looking for shortcuts through neighborhoods. We could have seen it as a sign that people were OK with smoggy skies and the dirt and the fumes that cause health problems. We could have told the people in North and Northeast Portland, "Sorry, the voters say it's not your turn yet to have a chance at better jobs and cleaner air." We could have waited five or 10 or 15 years and let our children deal with the economic and health consequences. But that didn't happen because that would have been irresponsible.

Instead, we as a region did something radical. We took the defeat as a challenge to find something better. And do you know who led the charge? The people. Business leaders got together with those who live and work in North and Northeast Portland. They decided that there was a better option for where to build the MAX line so that we would not have to displace even one home or one business. They decided there were better places where we could use the line to encourage new development to create the equivalent of 3,800 new jobs. They decided there were parts of the project that could be cut to save money.

Yes, there are millions of dollars at stake. Current estimates show that the project will cost about \$350 million. Of that, \$240 million would come directly from the federal government. Metro's \$55 million share is also made up of federal funds. While there is no direct property tax to fund this project, those federal tax dollars are still tax dollars that you contributed through gas taxes.

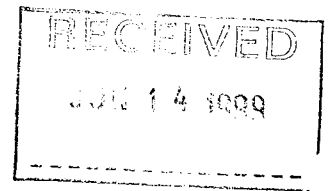
But with the Interstate MAX project, we will get more money back from the federal government than we put in. Would you rather your contributions went instead to some other mass transit project in some other state? The people in North and Northeast Portland say NO! It's their turn to share in the continued successes of this region and to know the economic, social and environmental benefits that light rail can bring.

In the end, this has nothing to do with big government, politicians or secret agendas. It has to do with people and their homes and their jobs and their families. For their sake, cut the rhetoric and look at the reasonable, rational alternatives.

Ed Washington is the Metro councilor for District 5, which includes much of North, Northeast and Northwest Portland.

REGONIAN • TUESDAY, JUNE 1, 1999

COMMUNITY



Transportation Dept.
Interstate Max
600 N.E. Grand Ave.
Portland, Or 97232-2736

June 10, 1999

To Whom It May Concern:

Subject: Light rail on Interstate Ave.

We have lived on Montana Ave for over 20 years, and have been very concerned about the increased traffic on Interstate Ave. Interstate Ave is the main and only North/South thoroughfare for many in the Overlook Neighborhood.

The resulting construction on Interstate Ave will only add to our already congested highway and leave most of us with only side streets as an option for travel. The prospect of so many people trying to find a faster route on side streets will surely cause increased accidents, injuries and/or death at uncontrolled residential cross streets and will endanger our children at play.

The construction that we just dealt with recently caused all kinds of problems, especially at the Going Street Intersection, where we were forced to wait for 2 or 3 light changes before proceeding through. This is also true when turning north from Going Street. When construction was underway I was waiting in line at Going Street for the Alberta Street light to change. What do we, the Tax Paying Citizens get after the construction of the light rail? A 4 lane Interstate, reduced to a 2 lane Street which will result in total gridlock, especially at rush hour.

I refuse to believe that all this construction, Gridlock and inconveniences, for a few riders that want to travel to Kenton, is really worth all this trouble and money. I am sure this is Big Business at our expense, and we the little people would like a voice in this matter.

THIS IS A **NO** VOTE FOR LIGHT RAIL ON INTERSTATE AVE.

SINCERELY

Teresa Cope

Teresa Cope
5214 N. Montana Ave.
Portland, OR 97217-3738

INTERSTATE
MAX
SDEIS

Your
Opinion
Counts

Comments (Please Print) I Think Portland is
not ready put light Rail on Inter-
state Avenue. I am 100% for
put Trolley buses on Interstate Ave
I was Streetcar Driver for 5 year
in Frankfurt till 1955 when I come
to Portland. I caused so much
Traffic problem. Between cars and Streetcars
I found Trolley Buses the Solution
for all The problem!!

Date 6-14-99
Name Viktor Pache
Phone number 285-6341
Address 6519 N. Delaware Ave
City / State / ZIP Portland OR 97267

Comments due to Metro by June 14th at 5 pm

5307

INTERSTATE
MAX
SDEIS

Your
Opinion
Counts

Comments (Please Print) I support the
concept of Interstate MAX.
I have voted for South-North
Light Rail. There can not
be any changes until we
are offered alternatives that
are effective.

The PDC decision on this
past Friday to study and
look at Urban Renewal is a real
plus and fits in with
the ALBINA COMMUNITY
PLAN. THANK YOU!

Date 6-14-1999
Name MARY LOUMUNROE
Phone number 503.283-2604
Address 2544 N. EMERSON ST.
City / State / ZIP PORTLAND. OR

Comments due to Metro by June 14th at 5 pm

JUN 14 1999

97217.3817

INTERSTATE
MAX
SDEIS

Your
Opinion
Counts

Comments (Please Print) N-S rail will increase
congestion, reduce service & waste
taxpayers money. Interstate Ave. is
the only North-South street west of the
freeway and the elimination of a lane
in each way will cause more traffic
jams than currently. The traffic jam
at Interstate & Going will be much worse
People living in the south overburden neighborhood
will be locked in since they must cross

Date June 12, 1999
Name Charles White
Phone number 286-4380
Address 1833 N Webster
City / State / ZIP Portland 9721

Interstate to get out
Bad idea!!!!
No to N-S light rail along
Interstate

Comments due to Metro by June 14th at 5 pm

INTERSTATE
MAX
SDEIS

Your
Opinion
Counts

Comments (Please Print) Dear Mr. Roberts:
Please record my support for the Interstate
MAX project as outlined by its SDEIS.
It is important for the region to construct
this addition to our rail transit network. While
this project is expected to generate 14,100
light rail trips per average weekdays the full
benefit of Interstate MAX will be realized when
it is extended north to Vancouver. This project
makes that extension a logical next step.

Date 6.11.99
Name David Zagel
Phone number 282-8568
Address 5204 NE 32nd Place
City / State / ZIP Portland, OR 97211

I am encouraged by the
lower cost of the all-Interstate
alignment and its potential for economic
development and I encourage you to
Comments due to Metro by June 14th at 5 pm
the region to move forward. DJZ

JUN 14 1999

INTERSTATE
MAX
SDEIS

Your
Opinion
Counts

Comments (Please Print)

IF "OUR OPINION COUNTS."
HOW COME, OUR NO VOTE IN THE LAST ELECTION
ABOUT INTERSTATE MAX "DOESN'T" COUNT.

"REMEMBER"

WE DID NOT ASK "WHY" THE EXPD CENTER
WAS BUILT IN THE "BOON DOCKS". ??? "REAL ESTATE"??

"ALSO" REMEMBER MR. & MS. POLITICIANS.

ELECTION'S ARE JUST AROUND THE CORNER !!!

"PLEASE"

Date _____

Name ROLLIN E. SULASKI

Phone number _____

Address 4005 NO COLONIAL AVE.

City / State / ZIP PORTLAND, OR. 97227

LET US KEEP OUR INTERSTATE AVE
BUS SERVICE. IT TAKES 11 MINS
FOR ME TO GET TO SANTZEN BEACH
IT'S A GOOD THING, WE HAVE, WHY

Comments due to Metro by June 14th at 5 pm CHANGE IT.

INTERSTATE
MAX
SDEIS

Your
Opinion
Counts

Comments (Please Print)

I AM OPPOSED TO INTERSTATE MAX
BECAUSE.
IT WILL CREATE HAVOC FOR RESIDENTS WEST OF INTERSTATE
BECAUSE THERE IS NO OTHER NO. 50. ST. FOR THOSE WHO
WERE GOING TO A DESTINATION THAT MAX WOULD NOT
SERVICE - IT WOULD CREATE AN IMMENSE BOTTLE
NECK FOR E.W. TRAFFIC COMING OR GOING
TO SWAN ISLAND. THERE WOULD BE LITTLE
PARKING AVAILABLE FOR BUSINESSES ALONG
INTERSTATE. - INTERSTATE IS AN ALTERNATIVE
ROUTE FOR I-5 TRAFFIC TIE UPS, WHICH FREQUENTLY

OCCUR - WITH ONLY ONE LANE
TRAFFIC AVAILABLE FOR NO. 50.
TRAVEL IT WOULD BE A
NIGHTMARE

Date 6/11/99

Name FARRELL W. WHITE

Phone number 281 3102

Address 4177 N. OVERLOOK TER.

City / State / ZIP PORTLAND, OR. 97217

Comments due to Metro by June 14th at 5 pm

NO INTERSTATE MAX

INTERSTATE
MAX
SDEIS

Your
Opinion
Counts

Comments (Please Print) I support THE project
100%. The Interstate Ave. portion of
the previous s/n proposal is clearly
the best + will attract the most
ridership. I'm also glad you have
put to rest the potential I-5
alignment which would have been
a disaster.

Because of the lack of park-n-rides that
will reside along Interstate Ave., Tri-Met, Met

+ Portland need to come up
w/ creative ways to get more
people to arrive at LRT stations
via bicycle. Covered bike

Comments due to Metro by June 14th at 5 pm
parking for 20+ bikes would be
a good start.

Date JUNE 10, 1999
Name JOE KARMAN
Phone number 231-5785
Address 909 NE TILLAMOOK ST.
City / State / ZIP PORTLAND, OR 97212

INTERSTATE
MAX
SDEIS

Your
Opinion
Counts

Comments (Please Print) _____

I support THE INTERSTATE MAX 100%,
HOWEVER I HOPE YOU WILL CONSIDER
THE FOLLOWING SUGGESTIONS:

- NO AUTO PARK-N-RIDES SOUTH OF EXPO+PIR
- PED + BIKE ACCESS ON DENVER VIADUCT
- PLACE KANTON STATION AS CLOSE AS
POSSIBLE TO DENVER AVENUE + POSSIBLE
~~REDEVELOP~~ REDEVELOP THE WHOLE MESSY WT94 SECTION
- BETTER BIKE PARKING THAN ON E/W

Date JUNE 10, 1999
Name ELIZABETH HAUEY
Phone number 223-7663
Address 1955 NW HOYT #24
City / State / ZIP PORTLAND, OR 97209

LIGHT-RAIL. EACH STATION SHOULD
HAVE COVERED PARKING + EXPLORE IDEA
FOR ONE BIKE "PARK-N-RIDE"
AT ONE STATION AREA.

Comments due to Metro by June 14th at 5 pm

INTERSTATE
MAX
SDEIS

Your
Opinion
Counts

Comments (Please Print)

THE INTERSTATE MAX LINE WILL NOT RELIEVE
THE TRAFFIC AROUND HAYDEN METROBUS OR
HAYDEN ISLAND - IT WILL ONLY MAKE IT WORSE.

ASO WHAT WILL HAPPEN TO TRIMET BUS #5?
BOTH WOULD USE INTERSTATE AVE. I DO NOT
THINK SO.

Date JUNE 9, 1999

Name JAMES M. OLHEISER

Phone number (503) 285-8132

Address 12480 N. SOUTH SHORE AVE

City / State / ZIP PORTLAND, OR 97217-8233

Comments due to Metro by June 14th at 5 pm

INTERSTATE
MAX
SDEIS

Your
Opinion
Counts

Comments (Please Print)

GOOD IDEA. INTERSTATE MAX IS NECESSARY.
ADEQUATE BUDGET NEEDS TO BE PROVIDED
FOR LANDSCAPING & STREETScape - SUCH AS:

- STATION AREA LANDSCAPING EQUAL TO
THAT ON EAST BURNSIDE.

- TRACK AREA SHOULD BE PAVED IN
CORBBLESTONE OR, AT LEAST, PATTERNED
CONCRETE.

Date 6.9.99

Name THOMAS BENNETT

Phone number 503.471.0746

Address 901 SW KING AVE. #1018

City / State / ZIP PORTLAND, OR. 97205

Comments due to Metro by June 14th at 5 pm

INTERSTATE
MAX
SDEIS

Your
Opinion
Counts

Comments (Please Print) I recently went to a public on the possible
Interstate Ave. light rail and I heard a lot of people make the claim
that bus #5 already runs there and meets the same needs MAX will.
False. It is obvious that many people ride MAX who don't ride buses.
Just take for example the Gresham-Downtown route of MAX. For years there
has been a bus running between those points. But now MAX which is
a lot bigger and runs more frequently is by far more crowded.
That is solid evidence that people are more willing to use MAX
than the bus, and I also know people who have that mindset.
Riding MAX is sufficiently "sophisticated" where riding the
bus is not, in their ~~mindset~~ minds.

Date June 9, 1999

Name Kenneth Mecklen

Phone number 252-7935

Address 8435 NE Glisan Street, Suite 708

City / State / ZIP Portland, Oregon 97220

You can count on the fact that a MAX
route that ^{runs where} a bus currently does, will
transport a lot more people.

Comments due to Metro by June 14th at 5 pm

INTERSTATE
MAX
SDEIS

Your
Opinion
Counts

Comments (Please Print) I support Interstate MAX in the interest
of reducing congestion and pollution
by getting cars off the road. I would
also like to suggest safe and covered
bicycle parking at several stations.
The surrounding residential area gives
a wonderful opportunity to ride your
bicycle several miles, park and lock it,
and continue your ride on MAX. People
from Vancouver also might
want to ride their bikes over the I5
bridge & then take MAX as long
as covered and safe bike parking
is available.

Date 6/9/99

Name _____

Phone number 503-224-8886

Address Sharon M. Fekety

City / State / ZIP 5858 S.W. Riveridge Ln.
Portland, OR 97201

Comments due to Metro by June 14th at 5 pm.

Sharon Fekety

INTERSTATE
MAX
SDEIS

Your
Opinion
Counts

Comments (Please Print) I think the idea of
putting MAX on Interstate is a good
idea. I think that sending it all
the way to Vancouver might even
be better. I think its image will cleanup
the North Portland neighborhood it
runs through as well. I hope things
go well, and construction begins
soon!

Date 6-9-99

Name John Bendickson

Phone number 289-2783

Address 1816 N. Willamette BLVD.

City / State / ZIP Port., O.R., 97217

Comments due to Metro by June 14th at 5 pm

INTERSTATE
MAX
SDEIS

Your
Opinion
Counts

Comments (Please Print)

I'm all for the Interstate
MAX Rail system. I would
love to have access to downtown
on MAX if it is such a
nicer ride than the bus!
I see no problem with just
one lane each way on Interstat
since we've recently have had
only two lanes when they
put in new pipes.
this last year.

Date June 8 1999

Name Licia Deuel

Phone number 286-3432

Address 1628 N. Simpson

City / State / ZIP POX OK 97217

Comments due to Metro by June 14th at 5 pm

INTERSTATE
MAX
SDEIS

Your
Opinion
Counts

Comments (Please Print)

As a person who travels in the Portland
area on a daily basis I know we
need the North ~~South~~ light rail.

Date 6-8-99

Name Kym Amador

Phone number 646 2106

Address 11925 SW Camden

City / State / ZIP Beaverton OR 97008

Comments due to Metro by June 14th at 5 pm

INTERSTATE
MAX
SDEIS

Your
Opinion
Counts

Comments (Please Print)

I'm completely in support of Inter-
state Avenue light-rail projects. There needs
to be incentives to get bikes, peoples to used
this system to the fullest! Also, there needs
to be better security at all stations stops,
alone with better safety feature, inter-locks.
Also, I feel there needs to be a projection to motivation
peoples from Vancouver, WASH to used this light-rail
which would reduced the flow of traffic on Interstate #5
in both directions.

Date 06-08-99

Name HARVEY L. GARNETT

Phone number 503-252-9963

Address 7140 S.E. Thorburn ST #B

City / State / ZIP PORTLAND, OR 97265

Comments due to Metro by June 14th at 5 pm

INTERSTATE
MAX
SDEIS

Your
Opinion
Counts

Comments (Please Print) I DO NOT SUPPORT THE
LIGHT RAIL PROJECT. SO FAR AS MY
CASE & OTHER BUSINESS PEOPLE
ARE CONCERNED THERE IS NO
SOLUTION FOR LEFT TURN ISSUE
TRAGEDY. BUSINESS PEOPLE WILL
LOOSE THEIR BUSINESS. THERE
IS NO POINT ABOUT THE GROWTH
OF ECONOMY. CITY & POLITICIANS
HAVE DOUBLE STANDARD. IT'S

Date 6-8-99
Name _____
Phone number 289-4800
Address _____
City / State / ZIP _____

NATU C. & KUSUM N. PATEL
dba Comfy Inn
8355 N. Interstate Ave.
Portland, OR 97217-6716

BETTER TO DROP OFF LIGHT
RAIL PLAN THAN TO FIND
OUT ANY OTHER REMEDIES
FOR GENERATING TRAGEDY.

Comments due to Metro by June 14th at 5 pm

NATU C. Patel

INTERSTATE
MAX
SDEIS

Your
Opinion
Counts

Comments (Please Print) Most of the people on Hayden
Island are of the opinion that we are best served
by bus #5, it only takes 25 min to get to down
town, and we don't have to drive 2 miles
to get it.
We also feel the business along Interstate
are will suffer from the light rail being
placed on it.

Date 6-7-99
Name Eugene Rogers
Phone number 285-3589
Address 12310 N. South shore
City / State / ZIP Portland, OR 97217

Comments due to Metro by June 14th at 5 pm

INTERSTATE
MAX
SDEIS

Your
Opinion
Counts

Comments (Please Print) I support the Interstate
Max line as a means of reducing
air pollution and cutting down
congestion because fewer autos
would be driven. For personal reasons,
I am a senior citizen who hates
driving freeways, so if this line
is built I would use it to get to the
Portland Expo. center, and possibly to
the Jantzen Beach shopping center.

Date 1/7/99
Name Winifred Holmes
Phone number 281-8175
Address 2325 NE 44 Ave.
City / State / ZIP Portland, OR 97213

(I realize that this line
would not go as far as
the shopping center.) I would
transfer either from MAX or bus
#77.

Comments due to Metro by June 14th at 5 pm

INTERSTATE
MAX
SDEIS

Your
Opinion
Counts

Comments (Please Print) _____

I ~~hope~~ fully support a light rail line designed
to serve the needs of North Portland
residents and neighborhoods. I ~~support~~
~~hope~~ this project really IS about them
and not about Vancouver.

I strongly encourage you to plan the line in
such a way to encourage cycling to stations,
and parking there. Please plan
covered, safe parking, and I think
about biking as a primary way to get
to the stations.

Date June 8 1999
Name Kassandra Griffin
Phone number _____
Address 1718 SE 34th
City / State / ZIP Portland 97214

Comments due to Metro by June 14th at 5 pm

INTERSTATE
MAX
SDEIS

Your
Opinion
Counts

Comments (Please Print)

I am strongly in support of rail transit running up Interstate Blvd.. Rail transit will hopefully cut down on vehicle traffic and encourage businesses to reinvest in the area. Although the tracks will cut down flow of traffic across Interstate, this may make the neighborhoods on either side of Interstate safer for children. I have a lot of friends who bike to work

Date 6/6/99

Name Chris Michalski

Phone number 335-0391

Address 4914 N. Maryland Ave

City / State / ZIP Pdx, OR 97217

and will be encouraged to do so by the addition of a bike lane.

Comments due to Metro by June 14th at 5 pm

INTERSTATE
MAX
SDEIS

Your
Opinion
Counts

Comments (Please Print)

IF MY OPINION COUNTS
Why does the Regional
"NO" vote not count?

Metro is doing what Big Business wants,
Not what The voters WANT.

Date 5-4-99

Name KAYLEY HODDICK

Phone number 326-2131

Address 6546 N. MARYLAND

City / State / ZIP PORTLAND, OR 97217

Comments due to Metro by June 14th at 5 pm

From: "Shearer, Jan" <SHEARER@tri-met.org>
To: "faracaj@metro.dst.or.us" <faracaj@metro.dst.or....>
Date: Mon, Jun 14, 1999 5:00 PM
Subject: FW: Interstate MAX comments

Hard copy to follow tomorrow - computers not compatible. Jan

-----Original Message-----

From: Gerard Mildner [mailto:mildneg@mail.pdx.edu]
Sent: Monday, June 14, 1999 4:49 PM
To: interstatemax@trimet.org
Subject: Interstate MAX comments

Please accept my comments to the North Portland LRT proposal. The attached file is in an RTF format. I can deliver a hard copy tomorrow if necessary.
Dr. Gerard Mildner

Dr. Gerard Mildner
Dept. of Urban Studies & Planning
Portland State University
PO Box 751
Portland, Oregon 97207-0751
mildneg@pdx.edu
(503)725-5175
(503)725-8770 fax

Too Costly to be True:
An Analysis of the North Portland Light Rail Proposal in Portland, Oregon

June, 1999

Gerard C.S. Mildner
School of Urban Studies and Planning
Portland State University
(503) 725-5175 tel.
(503) 725-8770 fax
mildnerg@pdx.edu

Executive Summary.

In March, 1999, a group of Portland business leaders proposed to build a 5.5 mile extension of the Portland, Oregon light rail system to the North Portland. This \$350 million project is being considered by several public agencies in the region: Tri-Met, Metro, and the City of Portland. This report analyzes the cost projections, ridership projections, and environmental impacts of the proposal and considers alternative policies.

Over two-thirds of the projected riders of the North Portland light rail line would still use the Tri-Met bus system if this project is not built. That is, they are riders who are being diverted from a bus to a train. For this reason, I have focused on the cost of producing an additional transit passenger trip.

Assuming ridership reaches forecast levels, the North Portland light rail project is estimated to cost approximately \$31 per additional transit passenger trip. Ignoring costs borne by the federal taxpayer reduces the cost per trip to \$13.45 per trip or \$26.90 per round trip. By comparison, the average cost of a bus transit trip in North Portland is only \$1.61 per passenger boarding.

Traffic congestion in North Portland and the I-5 corridor will deteriorate both during the construction and after the transit line is built, thereby questioning the purported environmental benefits. Alternative strategies, including increased investment in buses, congestion pricing, and high occupancy travel lanes, offer greater benefits and the potential for reduced taxpayer costs as well.

I. Introduction

In March, 1999, the several local business leaders proposed to build an extension of the Portland, Oregon light rail system to the North Portland. The transit agency in the Portland area, Tri-Met, currently operates an east-west light rail line from Gresham to Hillsboro, Oregon. Local residents had recently rejected a recent ballot measure that would have borrowed up to \$475 million in bonds backed by local property taxes to build a much more extensive light rail line from Clackamas County to North Portland. The entire line would have cost \$1.2 billion. In response to this initiative and the negative election results, Tri-Met developed a proposal for the North Portland line that would cost less money and require no property tax bonds or voter referendum.

The cost estimate for the project is \$350 million, including \$79 million for engineering and administration; \$70 million for 17 light-rail vehicles, \$46 million for street reconstruction, \$39 million for structures. (Metro, 1999, p. 11, adjusted for inflation to year-of-construction dollars)

This \$350 million figure, however, excludes a number of costs that are integral to the project. Indeed, important costs such as trains, contingency funds, land acquisition and right of way were left out of the analysis. Since I only have partial estimates for these hidden and missing costs, I will calculate the cost per rider figures using the \$350 million figure and let the reader decide what a true estimate of the project's cost would be.. I will also report cost estimates that focus only upon the expenses paid by local taxpayers.

II. Ridership and Cost

A. Calculating Average Cost Per Trip.

To begin, 2015 average weekday ridership on the line is projected at 14,100 (Metro, 1999, p.16). Because rail customers are often former bus customers and rail trips usually involve multiple boarding rides, the net increase in trips is much smaller. Previous studies of new rail projects in the United States indicate that a large percentage of rail riders would have been bus riders had the new rail line not have been built. For example, Tri-Met admits that 56% of the riders on the Eastside MAX line were really bus riders who were diverted to the new rail line (Richmond, 1998, p. 34). Metro estimates the net ridership gain from this project to be only 4,500 trips/day in the North Corridor or 4,400 trips system wide (Metro, 1999, p. 15).

As far as I can tell, the SDEIS never states an annual ridership figure. In its absence, I will multiply the weekday ridership by 312 equivalent days per year to identify an annual ridership. This calculation assumes that weekend ridership is 50% of weekday ridership, a figure which is true for the Tri-Met system as a whole. During the discussion about the Airport MAX projections, Tri-Met used a 12% higher figure to reflect weekend airport demand. However, given that such a large number of projected riders are diverted bus commuters, my estimate seems more appropriate. My calculation generates a annual North Portland light rail ridership of 4.34 million rides per year. And since two-thirds of the projected ridership would occur anyway, the net increase in transit trips is only 1.4 million additional trips per year.

There are two components of costs: operating and maintenance (O&M) and capital costs. Tri-Met estimates the net increase in operating and maintenance costs of North

Portland light rail as \$6.8 million/year (Metro, 1999, p. 43). That's + \$6.9 million for the light rail portion and -\$0.1 million for bus operations. I suspect that this figure ignores some canceling of bus lines, as Tri-Met has done with Eastside MAX and Westside MAX, but I will use the figure in the SDEIS.

As a result, the increase in operating costs per net additional transit trip for North Portland light rail is \$4.86 per trip (6.8/1.4). That's incredibly high given that all of the bus routes in North and Northeast Portland currently cost only \$1.61 in operating cost per boarding. And when operating costs is supposed to be light rail's big selling point, this increase in operating cost seems all the more surprising. In the best transit market in the region, we are considering the highest cost method of delivering new service.

Capital cost calculations are more complicated, given the problem of discounting and factoring in the federal dollars. I will offer three different ways to approach this calculation.

1. Average Local and Federal Cost

To begin the analysis, I chose 20-year amortization period at an 8% borrowing rate for the full \$350 million price tag for North Portland light rail. This isn't really the full cost since the opportunity cost of Interstate Avenue's inside traffic lane and other capital costs are not included, but it's the number in the SDEIS (Metro, 1999, p. 41). The amount needed to support such bonds is \$35.70 million per year, which amounts to \$8.23 in capital cost per ride, for a total of \$9.99 per boarding ride (including operating cost). By comparison, Tri-Met reports operating cost per boarding ride for its North Portland buses at \$1.22 per boarding ride with \$0.39 in capital costs, or only \$1.61 total, one-sixth of the cost of a light rail boarding.

2. Average Local Cost

If you assume that the federal money is entirely free to local taxpayers, the local share of capital costs falls from \$350 million to \$110 million. On an annual basis, this translates into \$11.22 million per year. Adding in operating costs and capital costs, North Portland light rail's average cost is \$4.35 per ride. Again, this is more than double the average cost of North Portland buses. Of course, bus purchases are also subsidized by the federal government, so the bus cost estimate is somewhat lower than stated.

Average Cost per Boarding Ride Light Rail Versus Bus

(20-year amortization @ 8 % interest, ridership estimates in year 2015,

		Operating Cost	Capital Cost	Total Cost
North Portland LRT	Total Costs	1.76	8.23	9.99
North Portland LRT	Local Costs Only	1.76	2.59	4.35
North Portland Buses		1.22	0.39	1.61

3. Marginal Cost

Because building the North Portland light rail line is an addition to an existing transit system, much of the ridership projected for the line is really a diversion of existing Tri-Met bus passengers. According to Metro's own analysis, over two-thirds of the North Portland light rail line's ridership are diverted passengers from the existing bus system.

For this reason, the cost of attracting an additional passenger to the transit system, the marginal cost, is much higher than the average cost.

When factoring in all the costs of the project, including federally-paid expenses, the marginal cost of a single additional transit trip is \$30.93. If you look only at local capital costs, then the cost of an additional transit trip is \$8.01 per trip.

Finally, if you assume that the opportunity cost of capital is only the local tax-exempt borrowing rate of 6% (this assumes displaced private investment occurs in rest of the world and we suffer no effects), then the net transit trip figure falls to \$8.01 per trip.

Marginal Cost per Additional Transit Trip Light Rail Versus Bus

(20-year amortization @ 8 % interest, ridership estimates in year 2015,

		Operating Cost	Capital Cost	Total Cost
North Portland LRT	Total Costs	\$5.44	\$25.49	\$30.93
North Portland LRT	Local Costs Only	5.44	8.01	13.45

Hence, using conservative assumptions, the combined operating and capital costs are \$13.45 per trip or \$26.90 per daily round trip, even assuming the federal money is free. This is even more amazing when you consider all the hoopla that this North Portland light rail project having such a bare bones budget. Surely, there are better ways to boost transit ridership, improve pollution, and support the community in North and Northeast Portland.

B. The Amortization Assumption

In the section above, I have calculated the annual payment required to retire a 20-year bond. The reason for the twenty-year calculation is the general principle for government borrowing that a bond issue should not exceed the useful life of the project. After twenty years, Tri-Met will face substantial future costs to replace cars and make other capital improvements.

Of course, using longer term bonds to finance a project would reduce the annual carrying cost, but it does not cause trains or track to last longer or depreciate less. In fact, much of Tri-Met's capital plant will need to be replaced during this time period. Tri-Met establishes 25 years as the optimal replacement period for its existing light rail trains and uses more rapid replacement schedules for other capital items associated with light rail (Tri-Met, 1998b, p. CR-5). The only capital item with an indefinite life span is land, but the opportunity cost of land is not included in Tri-Met's \$350 million cost estimate.

In addition, the effect of longer repayment periods is small due to the higher interest costs that accompany the longer time period. Using the Mortgage Constant Formula, which estimates the ratio of annual payments to the capital cost, we can calculate the net impact of changes in either the interest rate assumption or the time period of borrowing (Kau and Sirmans, 1985, p. 557). Using a 30-year borrowing period would reduce my estimates by only 15%, a small amount given the magnitude of the costs involved.

Mortgage Constant Formula

$$MC = i / (1 - (1 / (1 + i)^n))$$

Term (in Years)	Interest Rate	Mortgage Constant
20	10%	11.7%
20	8%	10.2%
20	6%	8.6%
30	10%	10.6%
30	8%	8.9%
30	6%	7.3%

Finally, one might question whether using borrowing rates is applicable at all, given that current resources and working capital are being used on the project. However, those funds have the opportunity costs as well. Tri-Met could choose to use those funds today to reduce its current debt burdens or invest them for the future. Only by putting in a value for interest rates can one analyze projects with costs and benefits in different time periods.

C. Taxable and Tax- Exempt Borrowing Rates.

My analysis used a borrowing rate that is relatively high for a tax-exempt, government borrowing rate, but relatively low for a taxable, private borrowing rate. There are several good reasons for considering taxable interest rates with this analysis.

First, public investment displaces private investment, so the true opportunity cost is the rate of return on private investment. Admittedly, some of that investment might take place in other states and localities. Second, all local residents are federal taxpayers, so the federal and state income tax subsidy is paid (in part) by them. Finally, this project

will be reviewed by the Federal Transit Administration, which represents citizens throughout the United States, most of whom will never travel to Portland, much less use Portland's transit system. Moreover, current practice within the federal government requires applying a 10% discount rate to evaluate future and current costs and benefits. (Musgrave and Musgrave, 1989, p. 159).

In response to previous public testimony that I've given regarding discount rates for light rail projects, Tri-Met proposed using a 6.0% discounting figure (Tri-Met, 1998d). However, in the table above, I show that the difference between using 6% versus 8% as the appropriate borrowing rate is only about a 15% savings in the annual amortization cost. Given the large magnitudes of the cost differential between bus and rail, 15% is a small number.

III. Ridership Estimates

A. Misleading Train Frequencies.

The Supplement Draft Environmental Impact Statement reports inconsistent numbers with respect to the capital costs and the ridership assumptions. As will be discussed later, the ridership forecast is based upon 24 trains in operation, but the capital costs assume that only 17 trains will be purchased.

Since the opening year train purchase is significantly less than the number of trains needed by 2015, all the advertised headway estimates for the line are misleading. The advertised frequency of service will not happen in 2004, when North Portland light rail is proposed to begin service. The service is estimated to bring 8 trains an hour to downtown or a train every 7.5 minutes (Tri-Met, 1999, p.17). By comparison, bus lines like the 14-Hawthorne actually have more frequent service than 7.5 minutes. However,

by only purchasing 17 trains rather than 24 trains, the proportionate number of trains per hour falls from 8 trains to 5.7 trains. And the headway frequency rises from 7.5 minutes to 10.6 minutes.

Hence, the plan for North Portland calls for 4 years of construction and increased traffic congestion on Interstate-5 and all the major arterial roads in North Portland, and in the end, train service in 2004 is no more frequent than an ordinary bus line! Why are we spending so much money to switch transit passengers from bus to rail?

IV. Pollution and Congestion Impacts

A. Pollution.

The Supplemental Draft Environmental Impact Statement claims there will be a reduction in vehicle miles of travel (VMT) and as a result, the report claims that pollution will be reduced. However, the report offers no evidence of this except that system wide transit ridership increases by 1.4% (Metro, 1999,p. 28) . According to the report, traffic levels in North Portland increase as a result of North Portland light rail on every major arterial besides Interstate Avenue (see below). Hence, from the perspective of the average resident of North Portland, local environmental conditions will get worse. Since bus operating costs are essentially unchanged, Metro cannot even claim any pollution reduction from a switch of transit trips from diesel-based buses to electricity-driven trains.

B. Automobile Congestion

Traffic on parallel streets in North Portland and I-5 get much worse. The Interstate 5 highway actually experiences a 1% increase in traffic compared to the No Build option (Metro, 1999, p. 21). The most impacted streets in North Portland are Denver (+58%), Albina (+33%), Greeley (+25%), Vancouver (+9%), and Martin Luther King Boulevard (+2%). The only improvement is Interstate Avenue (-50%) but that comes from losing half its capacity! In a recent article in The Oregonian, Metro Councilor Ed Washington argued that pollution in North Portland will improve as a result of this project (Washington, 1999). Clearly, the SDEIS and statements by Metro officials like Mr. Washington are misleading the public.

C. Train Congestion

The SDEIS suggests that the downtown MAX line will become a branched line with service either going to Gresham or the Expo Center, and possibly also to the Airport (Metro, 1999, p. 17-18). The report describes rush hour train frequency rising from 11 trains per hour (5.45 minute headways) to 19 trains per hour (3.15 minutes) and possibly to 23 trains per hour (2.61 minutes), should through route service on Airport MAX be implemented.

I don't believe this is possible. My understanding was that when Tri-Met tried to increase train headways during the Interstate-5 Bridge closure to below 5 minutes, enormous train delays occurred due to the bottleneck in the downtown portion of the MAX line. Due to our short blocks, traffic signal patterns, dwell times, loading times, and handicapped passengers, 5 minute headways on MAX were our technical maximum.

Attempting to operate more than 6 minute headways during the Interstate 5 Bridge closure earlier this year led to trains “bunching up” before they could reach downtown. Tri-Met stopped this experiment and has never successfully operated more than 10 trains per hour. In effect, the MAX light rail line is experiencing its own form of congestion.

If that’s true, someone is being lied to. Either frequency won’t be as great as modeled, peak hour service to Gresham will be cut, Airport MAX will be a Gateway shuttle, North Portland light rail service will deadhead at the Rose Garden, or the cost of a second downtown light rail route or tunneling project hasn’t been included in the SDEIS. Have voters been informed which of these alternatives will occur? Have they been told which North Portland bus routes will be cut?

Suppose the error is explained by future cuts in train frequency on the Banfield MAX line to Gresham. Current MAX service to Gresham during peak hours is one train every 6 minutes and 10 minutes during off-peak. Therefore, riders on this line will experience deterioration of service, which will lead to deterioration of ridership. This cost has been hidden because Tri-Met officials have reassured residents in the East Portland and Gresham corridor that their service will not be reduced. The other possibility is that Tri-Met will incur additional costs to build a new downtown distribution system. At some level, this mistake is extreme form of the ridership forecast problem.

IV. Hidden Costs of the Project

Having made several calculations using publicly-available data, there are a number of critical issues of cost and distribution of burdens that cannot be answered without

further data and investigation. The size of these hidden or understated costs is sufficient to question whether the SDEIS is intended to inform or deceive.

A. No Contingency Fund.

To protect local taxpayers, the 1998 South-North light rail project (and others before it) routinely included a 11-12% contingency for each of the capital cost items in the project. For South-North as a whole, the contingency funds were a \$100 million cost item that served to guarantee that the project could be built, even if costs were higher than promised. For the Eliot and North Portland segments of the project, the contingency allocation was were 12% of the capital costs. (Tri-Met, 1998e, p. 2-46)

In the North Portland SDEIS, the line item for a contingency fund has been eliminated without any explanation (Tri-Met, 1999, p. 11). For a project with \$350 million in capital costs, this amounts to \$42 million of hidden expenses.

This missing cost item explains a rather curious statement in the SDEIS: "Eighteen different cost categories (listed in Table 2.4-1) have been used to consolidate these cost estimates. The definitions of these categories has not changed from the DEIS." (Metro, 1999, p. 10) Yet when reading the table, only 17 cost categories are listed, not the advertised 18. A simple use of the delete key on someone's computer appears to have "saved" the project \$42 million. However, that someone forgot to clean up the rest of the text of the report.

B. Hidden Station Costs.

The North Portland light rail project is purported to save in running time and capital cost by reducing the proposed number of stations in the North Portland and Eliot segments of the line. This involves reducing the number of stations from 11 to 10. However, the project has a much greater than proportional reduction in station reduction costs.

In the DEIS for the South-North project, the cost estimates for stations in the North Portland and Eliot segments was \$5.8 million, or \$527,000 per station in 1994 dollars (Tri-Met, 1998e, p. 2-46). Using the same 1994 dollars, stations in the North Portland light rail SDEIS cost \$3.5 million or \$350,000 per station (Tri-Met, 1999, p. 11). Putting this difference into the year-of-expenditure dollars, this amounts to \$2.7 million in unexplained cost savings.

It's possible that the reconfiguration of the Rose Quarter station in the original Draft Environmental Impact Statement was counted as a new station, thereby changing the difference in the number of stations between the two proposals to 12 stations to 10 stations. However, that still represents a reduction in the per station construction cost from \$483,000 to \$350,000, and an unexplained cost differential of \$2.03 million. If the stations are going to undergo such a dramatic reduction in expenditure, then the Supplemental Draft Environmental Impact Statement should have explained this cost savings and factored in the reduction in amenities into other parts of the project's analysis, including the ridership forecasts.

C. Hidden Vehicle Costs.

The \$350 million is the stated price tag for the North Portland light rail project. This is based upon an estimate in the South-North DEIS of \$223.4 million in 1994 dollars. Since

construction of the North Portland light rail project would occur in 2000-2004, it is appropriate to make all cost calculations in year-of-expenditure dollars, which are 57% higher due to inflation and finance costs. One of the largest cost items of the project are trains themselves. However, the cost of those two trains is severely underestimated.

First, Table 2.4-1 lists as individual components of the capital costs (Tri-Met, 1999, p. 11) This includes \$44.8 million for light rail vehicles and \$8.8 million for operating and maintenance facilities. Both of these figures are in 1994 dollars, so that in fact the year-of-expenditure dollars for those cost components are more accurately described as \$70.2 million for vehicles and \$13.8 million for O&M facilities.

Second, footnote #2 of this table says that "Transit vehicles and O& M facility are sized for opening year network." (Tri-Met, 1999, p. 11) This is important. On Table 2.3-1, which describes ridership and service characteristics, footnote #2 says "2015 operating plan would require 24 LRV [light rail vehicles]. Opening year service would require 17 LRVs." (Tri-Met, 1999, p. 9)

In other words, the \$70.2 million would only purchase a portion of the fleet of vehicles needed to achieve the ridership claims of 4,500 additional trips per weekday. Therefore, the true cost of acquiring 24 vehicles (upon which all the ridership numbers are based) is really \$99.1 million. And absent additional information, I assume that the operating and maintenance facility costs of the extra vehicles is proportionately higher as well: \$19.5 million instead of \$13.8 million.

Hence, all the cost per trip calculations that I have previously estimated are missing about \$34.4 million in expenses. Now, initially you might say that given the \$350 million price tag, that means we should inflate my previous estimate by 10%. However,

by not putting those costs in the SDEIS, the federal government will not be picking up their usual share of the cost of these additional 7 trains! Therefore, the local share of per trip costs will rise by more than 10%. If local taxpayers bear the entire expense, the local capital costs would rise by 30%.

Is this sloppy work or deliberate disinformation? All I can say is that estimating the capital costs of a low-service rail line and the ridership estimates of a high-service rail line in the same environmental impact statement is very deceptive. This suggests that one of the compromises needed to make this project appear affordable was to limit the level of service in the first decade of its operation to a level below that advertised. At the very least, Tri-Met needs to increase its stated project cost by \$34.4 million.

D. Hidden Park and Ride Costs

In the 1998 South-North DEIS, park and ride lots were planned for the north and south termini of the light rail lines, including a 3,500 space lot at Vancouver costing \$35.1 million (Tri-Met, 1998e, p. 2-46, 4-45). The assumption was that travelers from Vancouver would stop at the furthest point on the line to transfer to light rail (similar lots were also planned in Milwaukie and at Clackamas Town Center).

However, with the North Portland light rail project, no money was allocated for park and ride lots, either in the Kenton neighborhood or at the Exposition Center (Tri-Met, 1999, p. 11). Instead, an existing parking lot of 500 spaces at the Exposition Center would be used as a shared park and ride facility. However, this line would be used by commuters from Clark County and moving in the terminus will only reduce that demand marginally. As the 1998 DEIS stated, when comparing termini locations:

“With the MOS 5 Alternative, a Lombard Street Station (or a Kenton Station) would be more likely to attract drop-off trips and park-and-ride activity on local streets and property in comparison to the Full-Length or MOS 1 alternative. As the northern terminus, this station could attract trips from many north Portland locations and even from Clark County, Washington.” (Tri-Met, 1998e, p. 4-42)

The 1998 DEIS is pointing to a problem when adjusting the terminus of the light rail line. Since there is no residential population and little bus service at the Expo Center, almost all demand at that station would be automobile riders. Even if an existing parking lot like the one at the Expo Center is used, that real estate has value as well. The need to build a parking lot has been left out of the SDEIS, and this would cost somewhere between zero dollars and \$35.1 million.

E. Hidden Right-of-Way Costs

Tri-Met and Metro has made no valuation for the cost of the right of way on Interstate Avenue that the MAX line will occupy. Interstate Avenue is being reduced from 4 lanes down to 2 lanes, which will create spillover traffic on numerous parallel routes in North Portland. In the DEIS, the total allocation for right of-way capital costs is \$3.6 million. (Metro, 1999, p.11) The cost of widening existing arterial roads to compensate for this loss of road space would be appropriate amount to add to the total cost of the project, which would certainly be much larger than \$3.6 million. In a section elsewhere, I discuss the pollution and traffic congestion impacts of this loss of road space.

V. Tri-Met’s Weakened Financing Position

A. Exaggerated Revenue Forecasts.

A troubling assumption in the SDEIS comes in the financing section where the report discusses whether Tri-Met can afford to operate the train system that they are purchasing. After discussing how much funds are going to put forward by Tri-Met, the City of Portland, and Metro, the report makes a simple statement:

“System revenues are based on the assumptions similar to those described in the South/North Corridor DEIS. The key assumption is that payroll tax revenue growth will average 7.2 percent beginning in FY 2003.” (Tri-Met, 1999, p. 44)

First, the statement is misleading. I went back to the South/North DEIS and found that the original payroll tax revenue assumption was for 6.8% annual increases (Tri-Met, 1998e, p. 7-10). Hence, the financial assumptions in the North Portland SDEIS are even rosier than the previous study.

Second, payroll tax revenue growth comes from either expansions in the employment base or growth in wages. The statement in the SDEIS assumes that the current economic expansion will last for 15 more years, and that wages and employment will continue to grow at 7.2 percent annually. Everyone seems to forget the payroll tax revenue declines and the transit service cutbacks of the 1980's. In a revealing comment, the report states :

“While a system revenue shortfall is not projected by the year 2015, conditions could change. Given that reasonable levels of beginning working capital are projected to exist, it is very likely that any deficit would be of a magnitude that could be met by standard

management techniques, such as adjusting fares or altering the rate of service increases." (Tri-Met, 1999, p. 44)

Now while this statement may be reassuring to New York bondholders and officials in Washington, D.C., that Tri-Met's indebtedness from North Portland light rail project could be eventually paid off, to ordinary passengers, the phrase "standard management techniques" means unexpected and unplanned fare increases and reductions in bus service. When tough choices have to be made, Tri-Met will certainly view the light rail line as "too big to fail" and neighborhood bus service will be cut.

B. Abandoning the Operating Capital Target.

The Financial Analysis of the 1998 South-North DEIS illustrated how Tri-Met would fund its capital investment through the year 2015 and announced an official target of having 3 months of operating capital on hand. The report stated:

"While two months of working capital is the minimum standard, Tri-Met has a goal of maintaining a working capital reserve of at least three months of operation." (Tri-Met, 1999, p. 7-9) The DEIS noted that the various alternatives would go below three months of working capital for only one or two years, depending upon the alternative chosen.

With the North Portland proposal, the amount of operating capital falls below Tri-Met's three-month target in six fiscal years - 2004-2009 - just as the North Portland light rail project begins operations. This suggests that the project is being under-financed and possibly that capital costs of the project are being hidden in other capital accounts in Tri-Met's budget. For example, at the end of the construction period for proposed

South-North light rail, Tri-Met would have had 4.4 months of working capital (Tri-Met, 1998e, p. 7-10). With the proposed North Portland light rail project, the amount of working capital available is only 2.6 months (Tri-Met, 1999, p. 45).

To have built up those capital funds to their target level, Tri-Met would have had to borrow more and seek additional taxpayer support. Thus, by minimize the financing costs of the North Portland project, Tri-Met has allowed its financial target of three months of operating capital to slip. This gives further evidence that Tri-Met's long term financial health is being endangered by the North Portland light rail project.

VI. The Limits to Light Rail

Much of the report indicates that the North Portland light rail project is a poor public investment. To understand what kind of public policies might be more effective, we need to understand a few issues regarding travel behavior and transportation systems.

A. The Inefficiency of Light Rail

Supporters of light rail system argue only by developing a dense rail network will sufficient economies of operation and usage appear that will guarantee high ridership. Certainly, a bus line or rail line built in isolation is not worth very much. In building an integrated transit system, Tri-Met has chosen some sensible policies regarding transfers and fare zones and bus scheduling with this in mind. Having two 30-minute headway bus lines intersect doesn't do much good unless they intersect at similar times. And since people in a neighborhood have multiple destinations, it makes sense to create a grid or network of routes so that they can all get to their destinations.

However, this points out one of the main weaknesses of light rail. Because light rail is a fixed guideway system with high capital costs, there is little benefit from "branching" a trunk line. Instead, the "least inefficient" way of delivering transit service to the suburbs is to build a trunk line and orient all the suburban bus routes as feeders into the trunk line. The more efficient way is to produce an integrated bus network. With buses, one can operate multiple routes along a trunk line and then each of those routes depart from the busway and service individual neighborhoods. This allows suburban riders to minimize on transfer times and get to their destinations at lower overall cost.

Because of this, the true operating cost of light rail also has to include the cost per rider for the various feeders. That is, we need to compare the cost of an express bus/suburban bus network to a light rail/suburban feeder bus network. Thus, although MAX's operating cost per boarding is at a reasonable level, the operating cost for each of the feeder routes that light rail is dependent upon is very, very high.

For example, using FY1994 data, the lowest operating cost transit lines in the Tri-Met system (out of a total of 85 lines) were:

Tri-Met's Most Efficient Bus Routes

(Source: Jarigise, 1998)

Route	Operating Cost per Boarding
72 Killingsworth-82nd	\$0.90
15 NW 23rd Ave.	0.93
14 Hawthorne	1.03

15 Mt. Tabor	1.04
41 Capitol Highway	1.05

MAX came in 11th position at \$1.20 per boarding. The other top ten low cost routes were 9-Powell, 5-Interstate, 5-King Boulevard, 4-Division, and 40-Mocks Crest, all inner city Portland routes. The weighted average for the lines in the system was \$1.46 per boarding. Hence, at first blush, light rail looks cheaper to operate than the average transit line.

However, the suburban feeders that light rail depends upon are among the highest cost per passenger of any lines in Tri-Met's system: 26-Stark \$1.60, 24-Halsey \$1.68, 22-Parkrose \$2.16, 80-Gresham-Troutdale \$3.00, 83-Hollywood-47th \$3.24, 23-San Rafael \$3.30, 25-Glisan-Rockwood \$3.39, 81-Gresham-257th \$4.52, 84-Sandy \$4.53, and 27-Market-Main \$4.69.

Moreover, the person taking a light-rail train is more likely to be taking a linked transit trip involving two boardings, rather than a single boarding trip. Hence the cost of a Gresham bus-rail trip might be \$1.20 plus \$2.16, or \$1.20 plus \$3.30. By comparison, an express bus route that can troll through the suburbs to pick up passengers and bring them to activity center can do so at a much lower cost. Here are a few: 91-TV Highway Express \$1.81, 99-McLoughlin \$1.99, 96-Tualatin-I-5 \$2.04, 92-S. Beaverton Express \$2.23.

One of the sad effects of the opening of the new Westside MAX line has been the canceling of most of the express routes and their replacement with a host of light rail feeders to boost up light rail ridership numbers. Riders will largely experience increases in travel and transfer times and Tri-Met will experience rises in operating

costs. However, this decline in service and patronage is masked by the way that Tri-Met and other transit agencies collect ridership data.

Tri-Met and the other US transit agencies typically measures ridership by boardings rather than by trips. Since a greater proportion of light rail trips are linked trips, boardings will rise even though trips will not. Unfortunately, if we measure the success of a transit agency by the number of boardings (ridership) rather than mode share or number of trips (customers), they have every incentive to build a high cost trunk and feeder route network.

To give some data as evidence of this, Atlanta made a huge investment in its rail system between 1980 and 1985, and switched from a bus network to a hub and spoke heavy rail network. Between those years, ridership (i.e., boardings) rose by 88%. Over a slightly longer time period, 1979-86, linked trips rose by only 20% (Kain, 1996). Thus, most of the increase in ridership was simply a diversion of riders from buses to rail.

As we build the third, fourth, and fifth light rail lines, we are building lines in territory that is less and less likely to use transit at higher and higher cost. The "network" we will be left with will be one we cannot afford to operate.

B. The Inefficiency of Congestion.

A popular argument in favor of new rail systems involve comparisons with external costs of driving particularly automobile congestion and pollution. I agree that the congestion reduction externality is the benefit that should be aimed for in making transportation investments. An important question is what cost do we want to achieve that benefit. Is a single extra transit passenger worth \$18, \$21, \$24, or more?. In viewing

this cost estimate, the community needs to ask if the pollution or congestion benefits is anywhere near this high. Moreover, for a given level of benefit, could other transit investments, particularly in the inner city, achieve more transit riders at lower cost?

To answer these questions, we need to understand the distinction between transit ridership and congestion relief. There is a long accepted concept in transportation planning known as "triple convergence", first noted by Anthony Downs of the Brookings Institution (Downs, 1992). That is, when facing rush hour congestion, people react to the congestion by changing their behavior in three ways: (1) mode change (rail, transit, car, telecommute), (2) time of travel change (rush hour, off-peak), (3) and route change (highway, arterial). With congestion, actual roadway demand is lower than its potential because people avoid those conditions. However, this also means that during any rush hour condition, there is a lot of latent demand waiting to use the congested roadway, if only conditions would improve.

Thus, if a transit line is constructed and, say, 1,000 new travelers take that line, then at first blush, congestion on the competing highway improves, particularly during rush hour. However, because rush hour congestion improves, many travelers who had previously avoided the congestion, will revert back to the congested highway. That is, they change their mode, the time of travel, and their route. Thus, there are big differences between gross number of transit riders and the net effect on riders.

Interestingly, this effect also holds for new highways, which a lot of planners and environmentalists have caught on to. That is, build an extra lane of highway and traffic conditions improve. However, the improved conditions themselves then induce people who had not taken that route before (or had use an alternative mode or time of day) to adopt the highway. Downs calls this "triple convergence". People speak of this as

"highways inducing travel demand" or "the high cost of building our way out of traffic congestion." Unfortunately, the same principle applies to transit use.

VII. Alternatives to North Portland Light Rail.

In the following sections, I describe two sets of alternatives for achieving mobility for North Portland residents and for the region as a whole. The first looks at increasing investment in buses in North Portland, in the same geography purportedly served by the light rail project. The second looks at more comprehensive ideas for increasing mobility. In some cases, the two alternatives will conflict, and in others complement each other. However, both sets of ideas are considerably more sensible than the North Portland light rail project.

A. The Bus Investment Alternative

As the Supplemental Draft Environmental Impact Statement shows, North and Northeast Portland is one of the lowest income sections of the Portland Metropolitan Area. And because income and mass transit usage are correlated, North Portland residents are some of the best customers in the Tri-Met system. Because of their patronage and high density, North Portland buses tend to have some of the lowest operating costs per boarding ride of the Tri-Met system.

However, the history of Tri-Met's practices for allocating buses to the various routes on the system has not been very favorable to North Portland residents. In the table below, I compare bus routes in the Tri-Met system that are similar in economic efficiency, where efficiency is measured as the operating cost per boarding ride. For example, North Portland routes 72-Killingsworth, 5-Interstate, 4-Fessenden, and 8-NE 15th are

comparable to routes such as the 9-Powell, 15-NW 23rd, 15-Mt. Tabor, 8-Jackson Park, 14-Hawthorne, 19-Glisan, 5-Capitol Highway, and, 17-Holgate in that all these lines have operating cost between \$0.87 and \$1.26 per boarding ride.

Tri-Met's Under-Investment in North Portland Buses

Morning Peak-Hour Frequency on N. Portland Bus Routes Compared
to Routes of Similar Efficiency (operating cost per boarding)

North Portland Bus Route	Peak Frequency	Other Bus Routes	Peak Frequency
72-Killingsworth	12	9-Powell	10
5-Interstate	10	15-NW 23rd	7
4-Fessenden	10	15-Mt. Tabor	7
		8-Jackson Park	6
		14-Hawthorne	7
8-NE 15th	8	19-Glisan	10
		5-Capitol Hwy.	15
		17-Holgate	10
		71-60th-122nd	15
6-ML King	15	20-Burnside	10
		12-Barbur	10
		12-Sandy	10
9-Broadway	12	33-McLoughlin	15
		54-Beav.-Hillsdale	20
		17-NW 21st	10
1-Greeley	15	19-Woodstock	10
		1- Vermont	15
		24-Halsey	15
33-Fremont	15	45-Garden Home	20
		62-Murray Blvd.	15

Efficient and equitable bus planning would direct new resources (i.e., new bus) to those routes which have low operating costs. Of course, for policy reasons, some inefficient bus routes might also be promoted simply for the sake of offering regional coverage and political support for the Tri-Met's payroll tax. However, there would not be any legitimate policy reason for offering different levels of service for routes of similar operating efficiency.

In the table above, I document how Tri-Met has consistently under-invested in bus routes in the North Portland corridor that they are belatedly proposing to serve. This failure to offer the higher frequencies than are offered in Southeast Portland and Southwest Portland routes of similar efficiency suggests a possible bias in the transit system against North Portland residents.

As an alternative to the expensive North Portland light rail project, I have designed a bus investment plan of similar cost for the North Portland region. In this bus investment plan alternative, I simulate a doubling of the frequency in the eight major bus lines in North Portland. For seven of the eight lines, I estimated the cost of doubling the number of vehicle hours of operation. For the 72-Killingsworth line, I doubled its number of vehicle hours on only one-third of the entire line since most its operation is outside of the North Portland area. Some of these frequencies may be sufficiently high that new routes may need to be designed to prevent "bunching" of bus routes, so that the exact implementation of this plan may differ in some regards. Nevertheless, the design of this plan dramatically raises bus service in North Portland.

By comparison, the North Portland light rail project focuses its new investment on a single corridor within North Portland, that along Interstate Avenue. The opening year of operation for North Portland light rail calls for 10 minute frequency on the light rail

line, and 10-minute frequency on the next-door Interstate Avenue bus line, for a combined frequency rate of 5 minutes. Admittedly, the Interstate light rail line will offer a faster service than the local bus. However, this advantage could be simulated on the other lines by creating local and express service, as is done on other lines in the Tri-Met system.

Comparing the Service Differences of the Bus Investment Plan Versus the Light Rail Plan

Service measured in minutes between buses during peak hours

	Bus Plan Frequency	MAX Plan Frequency
#1 Greeley	7.5	15
#4 Fessenden	5	10
#5 Interstate + North LRT	5	5
#6 ML King	7.5	15
#8 NE 15th Ave	4	8
#9 Broadway	6	12
#33 Freemont	7.5	15
#72 Killingsworth	6	12

To evaluate the costs of the bus investment alternative, I have used Tri-Met data on the operating cost per boarding ride and the number of boarding rides per route to calculate a cost per route. I have doubled this operating cost (or in the case of 72-Killingsworth, doubled its cost on the one-third of the line in North Portland). I have

then used Tri-Met data on capital cost per bus boarding ride to find the total annual capital cost. The results of this comparison are shown below.

Comparing the Cost Differences of the Bus Investment Plan Versus the Light Rail Plan

Cost estimates assumes a \$110 million in local cost for MAX, a 50% federal match for bus purchases, and evaluates capital costs at 6% interest rate for 20 years

	Bus Plan	MAX Plan
	Costs	Costs
Operating Cost	\$13.4 m/year	\$6.8 m/year
Capital Cost	\$2.2m/year	\$9.5m/year
Total Cost	\$15.6 m/year	\$16.3 m/year

As you can see, the annual cost of the bus investment plan is somewhat less than the light rail project, even assuming the large federal subsidy to light rail capital costs and a favorably low interest rate. And given that the bus investment gives a higher level of service to the region, that plan seems a better purchase.

One key difference in the two concepts is that the bus investment plan will require a much larger share of operating costs as compared to capital costs. However, to put this issue into perspective, Tri-Met's payroll tax revenue is growing by approximately \$10 million per year. Hence, within two years, the amount of new revenue to Tri-Met operating costs would be sufficient to cover the operating cost of the new route enhancements. Moreover, Tri-Met is proposing to invest \$50 million in North Portland light rail, which would cover almost 4 years of operating the bus investment plan. After

that time period, Tri-Met's payroll tax revenues would have risen to a much higher level where the extra cost could be more easily afforded.

The second issue is that the bus investment plan could be implemented in a much shorter time period and with fewer traffic congestion hassles because the road infrastructure is already in place. New buses could operating as soon as Tri-Met maintenance facilities and buses are purchased. Moreover, the community would not have to endure four years of agonizing rail construction and extra traffic delay to get new transit service.

The bus investment plan simply offers greater service with more direct routing of passengers from their home to their destination. Tri-Met needs to work with its strengths in bus scheduling and bus network management to deliver significantly enhanced transit service to its best customers, the residents of North Portland.

B. Other Policies for Mobility.

There are many ways to achieve better access and higher ridership gains other than building a light rail extension. Here I will focus on the broader issue of regional mobility, rather than achieving mobility in North Portland.

- **Buy Clean Buses**

For a fraction of the \$90 million proposed to purchase 24 light-rail vehicles, Tri-Met could purchase low-pollution, natural gas buses. For \$17 million, Tri-Met could purchase over 70 natural gas buses, which would increase Tri-Met's fleet

by 11%. For Tri-Met's full \$50 million expenditure, the fleet could be expanded by over 25%.

- **Deregulate Taxis**

The current flat per-mile fare system of taxi-cab rates penalizes taxi customers who have lower average costs than other riders. For long distance commuting trips, their fares are substantially above cost, which is demonstrated by the hours that taxi drivers waste in the holding pen at the airport while waiting for a customer. The city and the Oregon Department of Transportation need to explore jitneys and shared cab ride service to provide high speed service at an affordable price.

- **Endorse Congestion Pricing on Interstate-5**

A Metro/ODOT Task Force recently looked at eight congestion pricing experiments, including an I-5 North option. Congestion pricing would reduce travel time and create lasting incentives for people to use alternative modes, not just for airport travel but for commuting travel as well. By endorsing that option, the community could improve travel times for customers who rely upon the highway to get them to their destinations.

VII. Conclusions.

Fundamentally, building the North Portland light rail extension is a waste of resources that the Portland region cannot afford. Taxpayer resources could be used for better alternatives. With Tri-Met's \$50 million contribution alone, bus service on the entire

system could be expanded by 25%,. By comparison, the North Portland light rail project offers only a 1.4% ridership increase (Metro, 1999,p. 28) . Before deciding whether to subsidize light rail trips at \$31 each, we must consider whether reducing bus services for inner-city passengers is an acceptable cost.

This region is in danger of believing our own press reports. In national publications, local government officials (correctly) promote up our scenery, our commitment to environmental protection, and our quality of life. In return, we get a lot of attention in the national press for our farmland preservation policies and our transit system. But ultimately, we have to live with the system we build, and we have to choose a system that is efficient, affordable, and realistic.

As an analogy, recall the life of the 18th century Russian noble, Grigori Potemkin, who sought to impress Empress Catherine the Great of the richness of his land by building fake villages along the route that she traveled. The buildings had the appearance of charm and prosperity, but little function. From this ploy comes the term "Potemkin villages."

In Portland, we are building Potemkin transit. It's new, it looks pretty, but it's very costly to build and very costly to operate. Designing a transit system around fixed routes and bus-to-rail transfers guarantees that passenger travel times will increase and net ridership will decline. Whether we face the same fate as Grigori Potemkin remains to be seen.

Like Potemkin, our knowledge of transit (particularly by non-transit users) is dominated by image and visual impression. People will often say that "the experience of light rail is better than riding the bus." However that's a bit like saying that the new Mercedes is a better ride than the old Ford. If we keep on disinvesting in our inner city

bus system which gets faithful ridership at low operating cost, what kind of transit system will we be left with? Or will we get to the point of Los Angeles where the bus riders and the NAACP had to sue under the civil rights laws to stop the transit agency's unrealistic rail construction projects and stop the diversion of revenue from the bus system?

My recommendation is that we declare victory with this year's opening of Westside light rail and call an end to the diversion of mass transit money from buses to light rail. Instead we should focus developing a truly balanced transportation system. This means maintaining our bus system, removing property tax subsidies for road construction, deregulating taxi and van shuttles, and using congestion pricing and HOV lanes to actually increase mobility and access.

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