

BEFORE THE METRO COUNCIL

FOR THE PURPOSE OF AMENDING THE REGIONAL)
TRANSPORTATION PLAN TO INCLUDE THE TWO) Ordinance No. 03-1007A
PHASES OF THE SOUTH CORRIDOR STUDY)
CONSISTING OF THE I-205 LIGHT RAIL TRANSIT)
(LRT) PROJECT FROM GATEWAY TO CLACKAMAS) Introduced by Councilor Newman
REGIONAL CENTER WITH PORTLAND TRANSIT)
MALL LRT, EXPANSION OF LRT FROM DOWNTOWN)
PORTLAND TO MILWAUKIE AND DELETION OF)
PLANS TO EXTEND LRT FROM MILWAUKIE TO)
CLACKAMAS REGIONAL CENTER)

WHEREAS, extensive analysis was completed in the form of the South Corridor Supplemental Draft Environmental Impact Statement ("SDEIS"), published on December 20, 2002, which evaluated a no-build alternative, a Bus Rapid Transit Alternative, a Busway Alternative, a Milwaukie Light Rail Alternative, an I-205 Light Rail Alternative and a Combined Light Rail Alternative along with various design options; and

WHEREAS, the public was invited to comment on the SDEIS during the public comment period from December 20, 2002 through February 7, 2003, and comments received during the comment period, including at two public hearings, are documented in the South Corridor Project Public Comment Report (February 2003); and

WHEREAS, the South Corridor Policy Committee reviewed the SDEIS, considered the public comments and adopted a recommendation to amend the South/North LPS through a two-phased major transit investment strategy for the South Corridor, with the I-205 Light Rail Project as the Locally Preferred Alternative ("LPA") for Phase 1, including light rail transit on the Portland Transit Mall, and Phase 2, composed of extension of light rail transit (LRT) from downtown Portland to Milwaukie; and

WHEREAS, the local governments in the South Corridor have reviewed the Policy Committee's recommendations for a two-phased approach, including the I-205 LRT project, and the TriMet Board, ODOT, and the local governments each adopted a resolution supporting these recommendations; and

WHEREAS, Federal Transit Administration (FTA) regulations require that the Locally Preferred Alternative be included in the Financially Constrained Regional Transportation Plan (RTP) and the Metropolitan Transportation Improvement Plan (MTIP) in order to be advanced to preliminary engineering; and

WHEREAS, the Metro Council adopted Resolution No. 03-3290, endorsing a multi-year commitment of MTIP funds that includes the I-205 LRT project; and

WHEREAS, the existing 2000 RTP designates the segment along I-205 from Gateway to Clackamas Regional Center as Rapid Bus; and

WHEREAS, the Metro Council adopted Resolution No. 03-3303, amending the Locally Preferred Strategy to include the Phase 1 I-205 LRT Project from Gateway to Clackamas Regional Center, including LRT along the Portland Transit Mall, and a Phase 2 extending LRT from downtown Portland to Milwaukie as the Locally Preferred Alternative and directed staff to prepare an amendment to the 2000 Regional Transportation Plan to include the I-205 LRT project; now, therefore

THE METRO COUNCIL ORDAINS AS FOLLOWS:

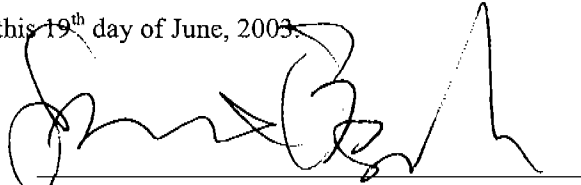
1. The text of the 2000 Regional Transportation Plan (RTP) is amended as indicated in Exhibit A, attached and incorporated into this ordinance, to include the Locally Preferred Alternative, adopted by the Council in Resolution No. 03-3303, in the Financially Constrained RTP.
2. The following maps of the RTP are amended as described here and as indicated in Exhibit B, attached and incorporated into this ordinance, to include the Locally Preferred Alternative in the Financially Constrained RTP:
 - a. Amend Figure 1.16, Regional Public Transportation System map, to replace the 'Rapid Bus' designation from Gateway to Clackamas Regional Center with a 'Planned Light Rail' designation; to replace 'Proposed Light Rail' to 'Planned Light Rail' on the downtown Portland to Milwaukie corridor; to extend the

Planned Light Rail in the downtown Portland transit mall to Lincoln Street in the Central City inset; and to remove the “Proposed Light Rail” from Milwaukie to Clackamas Regional Center.

- b. Amend Figure 5.2, Regional Transit Service Strategy map, to replace the “Rapid Bus” designation from Gateway to Clackamas Regional Center with a “Light Rail Transit” designation; to delete the “Light Rail Transit” designation from Milwaukie to Clackamas Regional Center; and to extend “Light Rail Transit” to Lincoln Street along the downtown Portland Transit Mall on the Central City inset on the following page.
- c. Amend Figure 5.9, Portland Central City Transportation Projects map, to add project number 1001 as a financially constrained project; to show “Light Rail Transit” on the downtown transit mall on the Portland Central City inset; and to add a number 1001 as a financially constrained project.
- d. Amend Figure 5.10, East Multnomah County Transportation Projects map, to add project number 1001 as a transit improvement along I-205 from Gateway to Clackamas Regional Center and as a financially constrained project; and to revise the Gateway inset to include project number 1001 along I-205 from Gateway south.
- e. Amend Figure 5.12, Urban Clackamas County Transportation Projects map, to add project number 1001 as a transit improvement along I-205 from Gateway to Clackamas Regional Center and as a financially constrained project; to delete the blue transit line from Milwaukie to Clackamas Regional Center; ~~to delete the blue transit line south of Clackamas Regional Center including project number 5129;~~ to delete project number 1001 just east of Highway 224; and to add project number 1001 to I-205 transit north of Clackamas Regional Center to the Clackamas Regional Center inset.

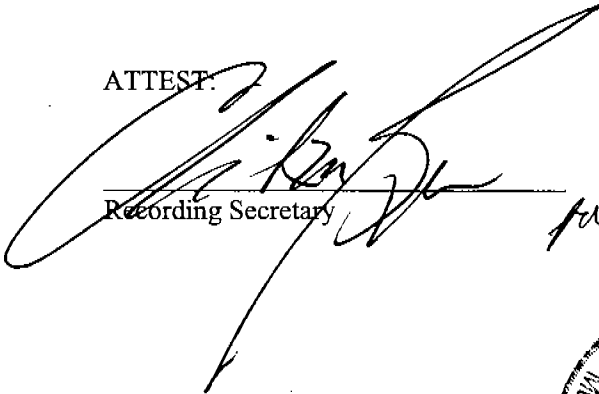
3. The Council adopts the Findings of Fact and Conclusions of Law in Exhibit C to explain how these amendments comply with the policies of the Regional Framework Plan, the RTP, the statewide planning goals and other applicable legal requirements.

ADOPTED by the Metro Council this 19th day of June, 2003.



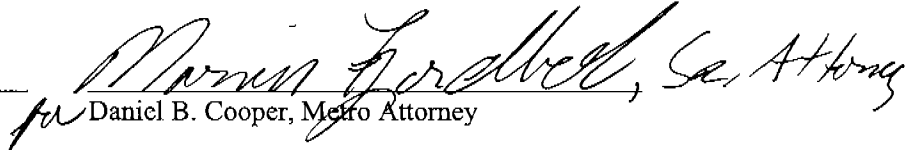
David Bragdon, Council President

ATTEST:



Recording Secretary

Approved as to Form:



Daniel B. Cooper, Metro Attorney

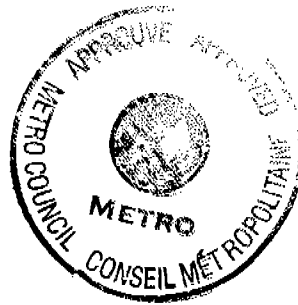


Exhibit A to Ordinance No. 03-1007A

Proposed South Corridor RTP Text Changes

Ordinance 03-1007 proposes amendment of the Regional Transportation Plan so that a general alignment for planned light rail transit is shown from Gateway to Clackamas Regional Center, including LRT improvements to the Portland Transit Mall as a first phase. The second phase includes extension of light rail transit from downtown Portland to Milwaukie. In addition, it includes deletion of proposed light rail between Milwaukie and Clackamas Regional Center. More specifically, it includes the following:

1. Chapter 5, page 5-8 , Subarea 2: Portland Central City and Neighborhoods, second paragraph, revise second sentence to state: "~~Transit service in this subarea is mostly limited to regional bus service and light rail, extending north to the Portland Metropolitan Exposition (Expo) Center, and south from Gateway to Clackamas Regional Center along I-205, including Portland Transit Mall LRT improvements and south from the Portland Transit Mall to the Milwaukie regional town center, from the Rose Quarter transit center, and then Extension of high capacity transit north~~ potentially to Clark County, Washington may also be considered. "

2. Chapter 5, page 5-9, Subarea 3: East Multnomah County - revise to read: "Transit service in the East Multnomah County subarea included regional bus service and light rail. Extension of light rail transit from Gateway regional center to Clackamas regional center, including Portland Transit Mall LRT is included in the financially constrained system. Transit coverage in this subarea did not vary from the priority system, although both bus and light rail service are less frequent and there are fewer capital improvements to increase bus speed and reliability."

3. Chapter 5, page 5-10, Subarea 5: Urban Clackamas County - revise third sentence as follows: "Key improvements like adding capacity to I-205, Highway 224, the Sunrise Corridor ~~and high capacity transit to Clackamas and Oregon City regional centers~~ are not retained in the financially constrained system. ~~Transit service in this subarea include regional bus service and light rail, from the Rose Quarter transit center to the Milwaukie town center. A Light rail extensions from Gateway to the Clackamas regional center along I-205, including Portland Transit Mall LRT and from Milwaukie to the Portland Transit Mall Oregon City and Clackamas regional centers is not~~ are included in the financially constrained system."

4. Amend Chapter 5, pages 5-43, 5-51 and 5-61 under Light Rail Expansion to read: "Extend light rail service from the Rose Quarter transit center north to the Portland Metropolitan Exposition Center, ~~and south~~ along I-205 from Gateway to Clackamas regional center, including Portland Transit Mall improvements and south from the Portland Transit Mall to Milwaukie. ~~then p~~ Potentially high capacity transit could be extended to Vancouver, Washington. Provide interim bus service along McLoughlin Boulevard and Highway 224 from Clackamas regional center to the Portland central city until light rail service can be provided in this corridor."

5. Specific Corridor Studies 6.7.6(page 6-36) Amend the McLoughlin-Highway 224 section to read "~~The recently completed South/North light rail Corridor study demonstrated the desirability and feasibility of both a long-term need for high-capacity transit service in this corridor, and a short-term opposition to construction of light rail. light rail service to Clackamas Regional Center along I-205 from Gateway regional center, including improvements along the Portland Transit Mall as a first phase and between Milwaukie town center and downtown Portland as a second phase. However, the long-term transit need is still critical, as demonstrated in the RTP analysis where both highway and high-capacity transit service were needed over the 20-year plan period to keep pace with expected growth in this part of the region. Therefore, the recommendations for this corridor study assume a short-term rapid bus, or equivalent, transit service in the corridor, and light rail service is retained in the long-term as a placeholder.~~ Transportation solutions in this corridor should address the following design considerations...

- ~~Provide improved transit access to Milwaukie town center and between Gateway and Clackamas regional centers, including rapid bus in the short term, and light rail service from Clackamas regional center to Central City in the long term"~~

6. Amend the 2000 Regional Transportation Plan Appendix as shown below:

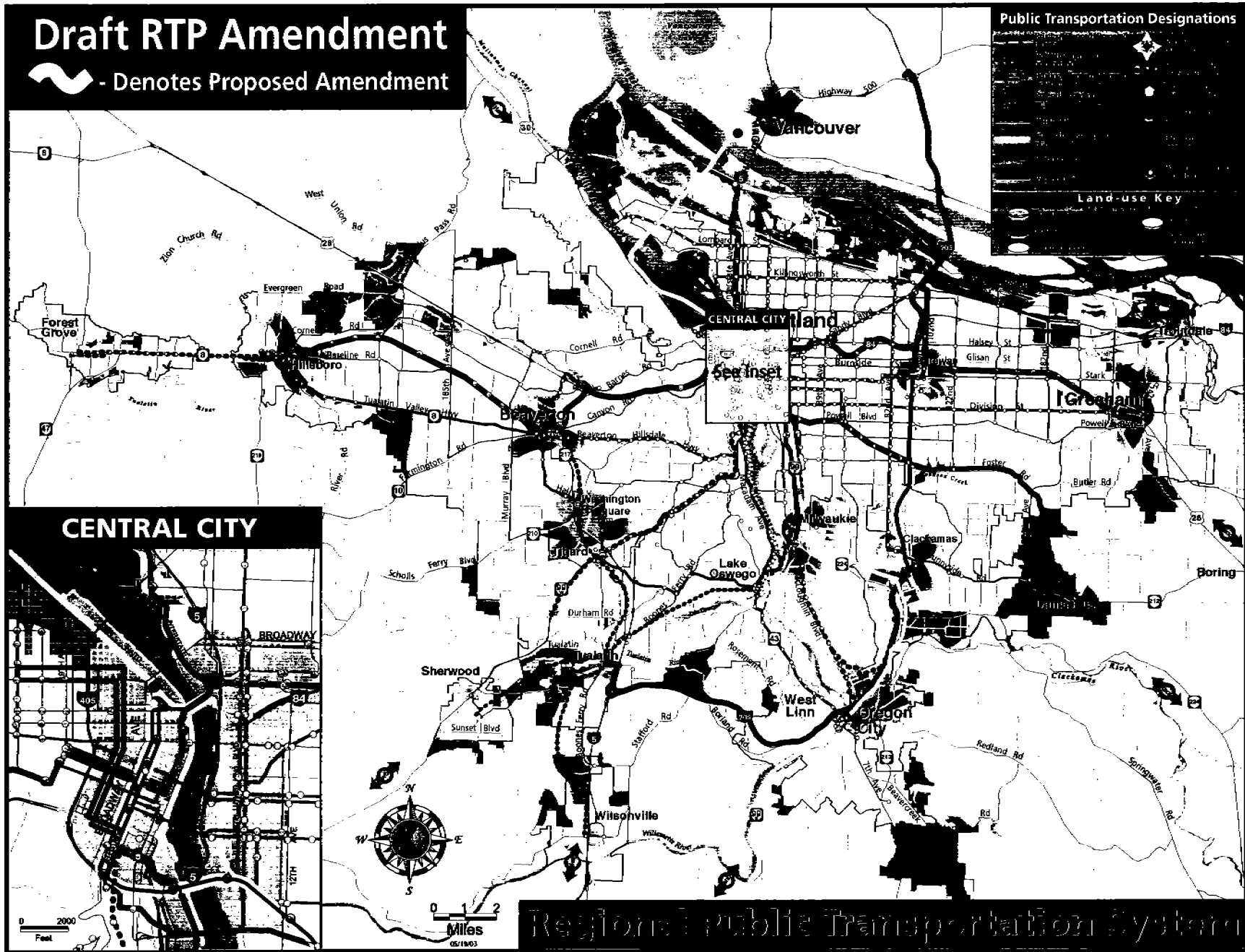
2000 Regional Transportation Plan Appendix

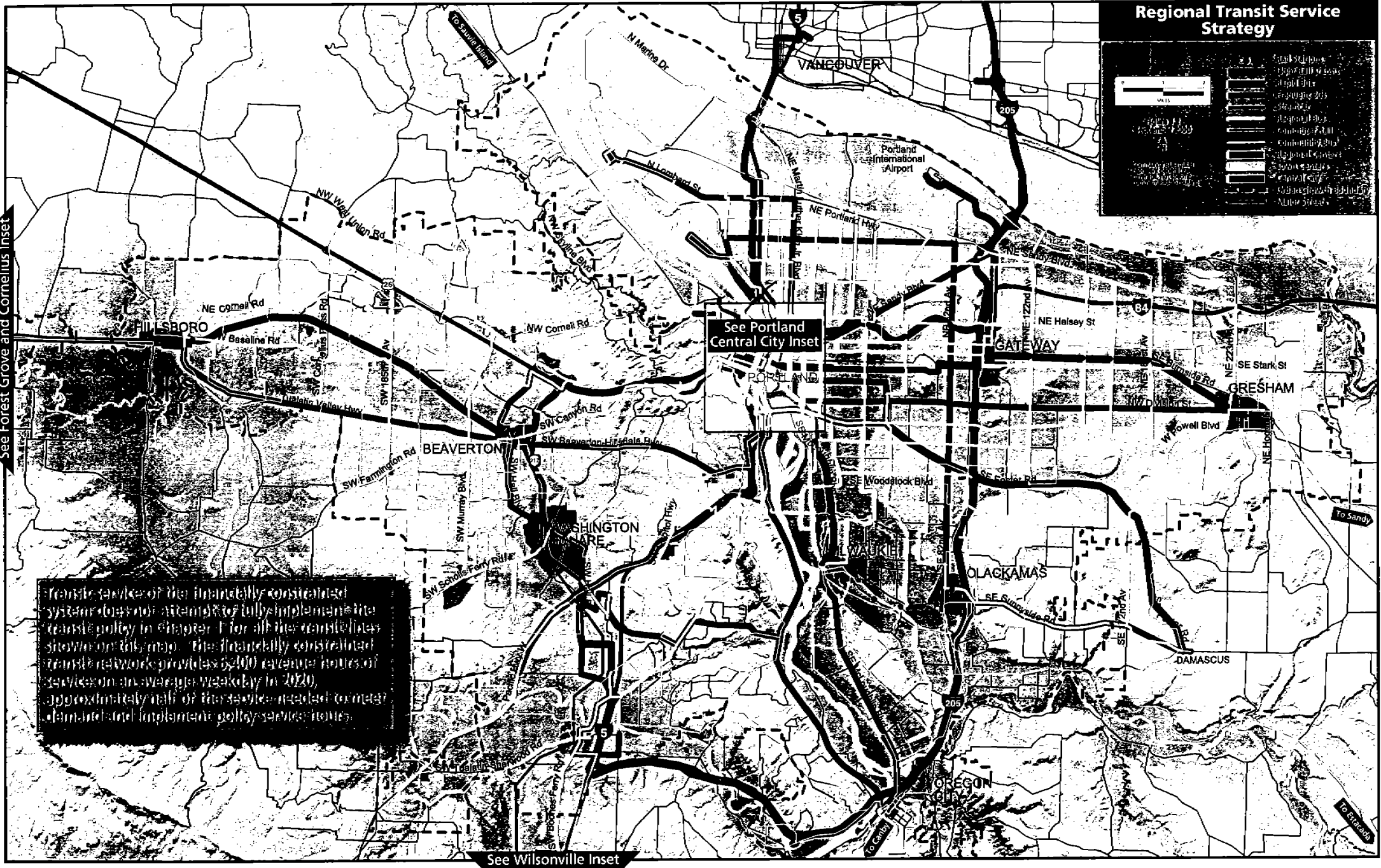
RTP Project List

(Proposed transit changes related to the South Corridor Project)

RTP #	2040 Link	Jurisdiction	Project Name (Facility)	Project Location	Project Description	RTP Preferred System	RTP Strategic System	RTP Financially Constrained System	Est. Project Cost in 1998 dollars	RTP Program Years
1001	Region	Tri-Met	Light Rail Extension 4.3	Milwaukee-Gateway BC to Clackamas TRC and Portland Transit Mall Extension	Construct LRT	X	X	X	\$250,000,000 \$349,000,000 (Gateway) \$151,000,000 (PDX)	2000-20
1003	Region	Tri-Met	Light Rail Extension 3.4	Rose Quarter Portland Transit Mall to Milwaukee TC	Construct LRT	X	X	X	\$750,000,000 \$514,000,000	2000-20

Figure 1.16





See Forest Grove and Cornelius Inset

See Portland Central City Inset

See Wilsonville Inset

Transit service of the financially constrained system does not attempt to fully implement the transit policy in Chapter 1 for all the constraints shown on this map. The financially constrained transit network provides 6,400 revenue hours of service on an average weekday in 2020, approximately half of the service needed to meet demand and implement policy service hours.

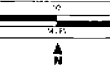
See West Columbia Corridor Map

How to use this map

This map is for illustrative purposes only. The map identifies the primary modal focus and general location of each Priority System project in the Portland Central City subarea. Projects labeled with symbol, are also included in the Financially Constrained System. Proposed future streets are shown as dashed lines. Unlabeled projects can be found on adjacent maps. A text description of each project follows the map.

2020 Priority System Portland Central City Transportation Projects

Figure 5.3
September 2000



- 1000 Project Number
- Motor Vehicle
- Freight Only
- Transit
- Bicycle
- Pedestrian
- Boulevard
- Multi-modal Plan
- Regional Centers
- Town Centers
- Central City
- Urban Growth Boundary
- Major Streets
- Local Streets

This map identifies the main focus of each project, however all road expansion projects include bike and pedestrian facilities as part of their design.

See Portland Airport Inset on West Columbia Corridor Map

See Portland Central City Inset

See Gateway Inset on East Multnomah County Map

See Beaverton Inset on North Washington County Map

See Washington Square Inset on South Washington County Map

See South Washington County Map

See Urban Clackamas County Map

See East Multnomah County Map

See Pleasant Valley and Damascus Map


See West Columbia Corridor Map

See Portland Airport Inset on West Columbia Corridor Map

See Gateway Inset


See Gresham Inset

How to use this map

This map is for illustrative purposes only, and identifies the primary mode and general location of each Priority System project in the East Multnomah County subarea. Projects labeled with  symbol, are also included in the Financially Constrained System. Proposed future streets are shown as dashed lines. Unlabeled projects can be found on adjacent maps.

2020 Priority System East Multnomah County Transportation Projects

Figure 5.10
September, 2000



▲ N

	Project Number
	Motor Vehicle
	Freight Only
	Transit
	Bicycle
	Pedestrian
	Boulevard
	Multi-modal Plan
	Regional Centers
	Town Centers
	Central City
	Urban Growth Boundary
	Major Streets
	Local Streets

This map identifies the main focus of each project, however all road expansion projects include bike and pedestrian facilities as part of their design.

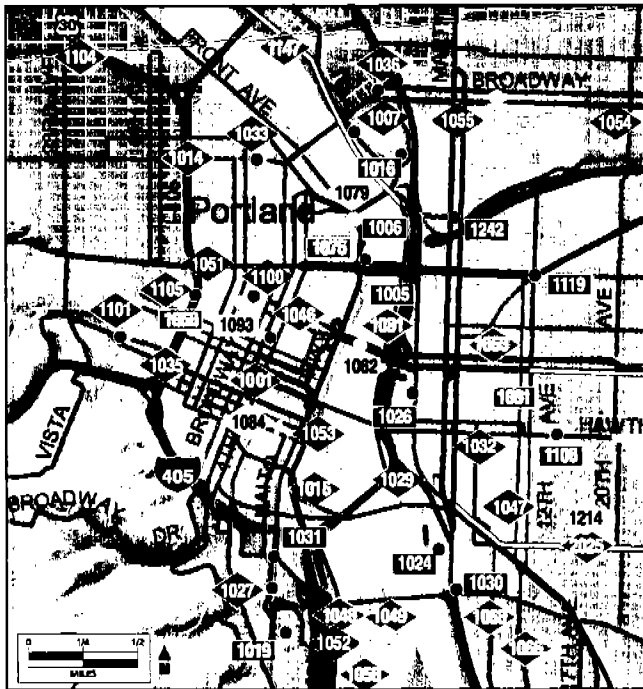
Proposed future streets are shown as dashed lines.

See Portland Central City Map

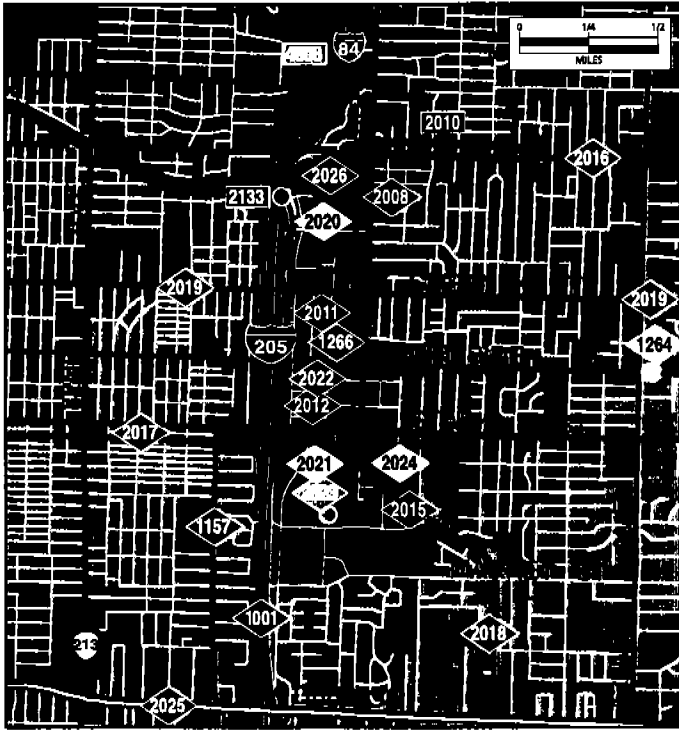
See Urban Clackamas County Map

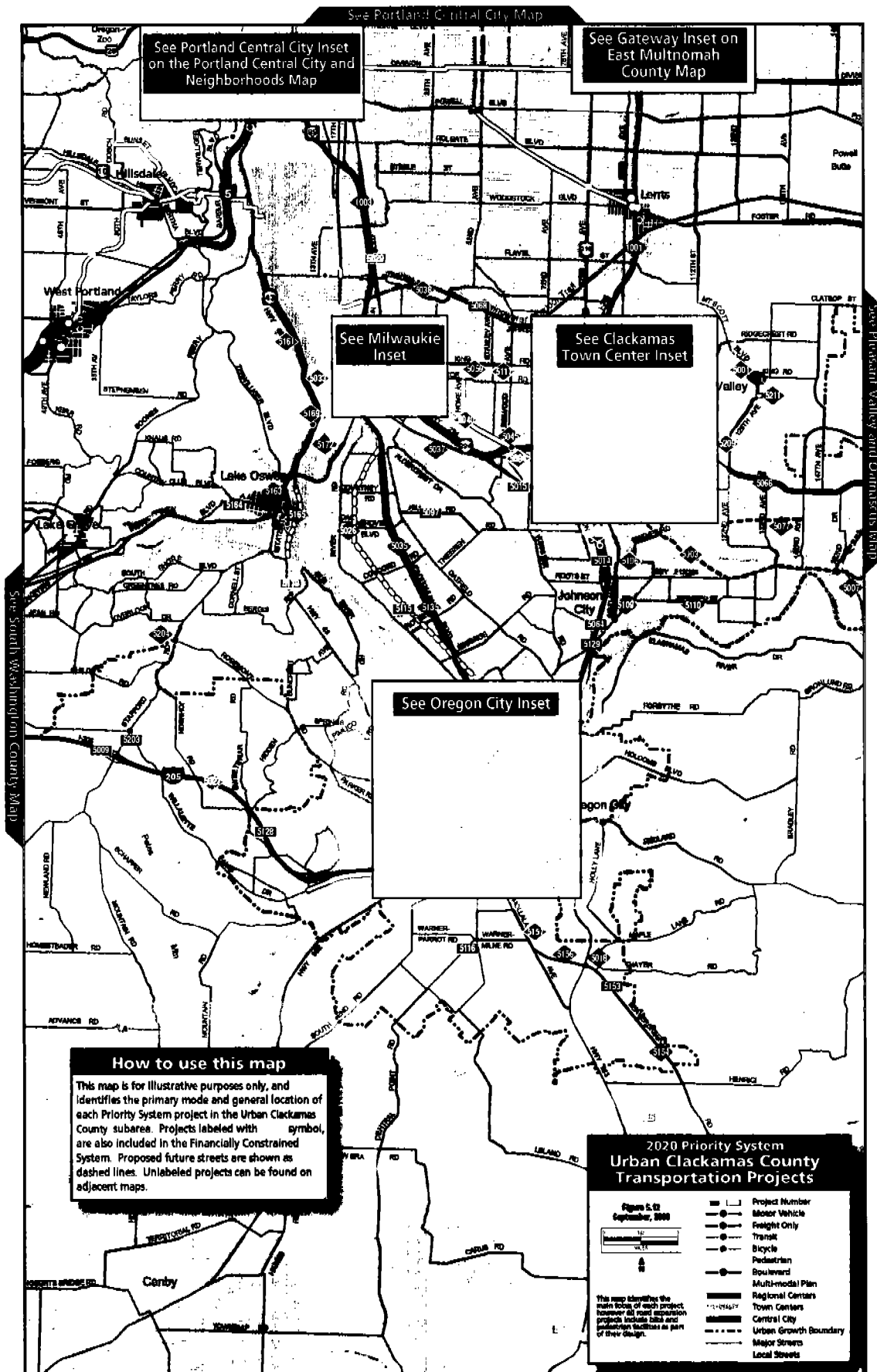
See Pleasant Valley and Damascus Map

Portland Central City Inset to Figure 5.9



Gateway Inset to Figure 5.10





How to use this map

This map is for illustrative purposes only, and identifies the primary mode and general location of each Priority System project in the Urban Clackamas County subarea. Projects labeled with symbol, are also included in the Financially Constrained System. Proposed future streets are shown as dashed lines. Unlabeled projects can be found on adjacent maps.

2020 Priority System Urban Clackamas County Transportation Projects

Figure 5.12
September, 2008

Legend:

- Project Number
- Motor Vehicle
- Freight Only
- Transit
- Bicycle
- Pedestrian
- Bicyclist
- Multi-modal Plan
- Regional Centers
- Town Centers
- Central City
- Urban Growth Boundary
- Major Streets
- Local Streets

This map identifies the main focus of each project however all road expansion projects include both and pedestrian facilities as part of their design.

Clackamas Town Center Inset to Figure 5.12

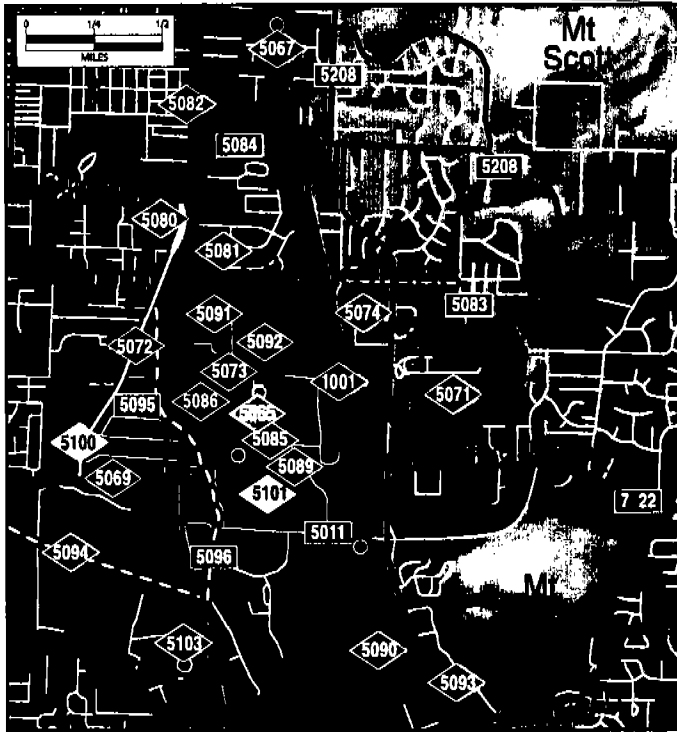


Exhibit C to Ordinance No. 03-1007A

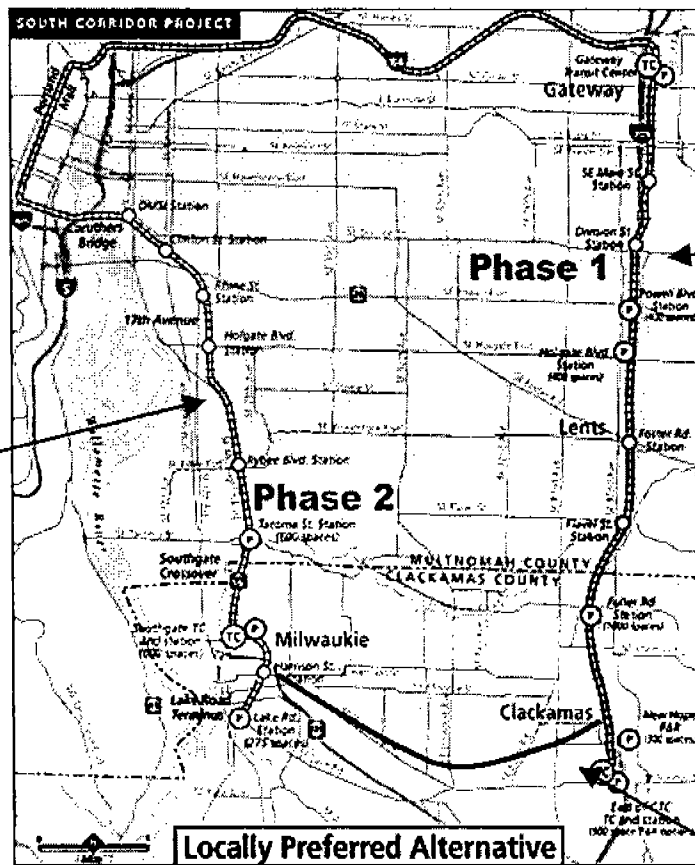
Findings of Fact and Conclusions of Law

Concerning Phases 1 and 2 of the South Corridor Project (I-205 Light Rail Transit from Gateway to Clackamas Regional Center, including Downtown Portland LRT alignment, extension of light rail transit from downtown Portland to Milwaukie and deletion of light rail transit from Milwaukie to Clackamas regional center) as an Amendment to the Regional Transportation Plan and to Demonstrate consistency with applicable statewide planning goals and Transportation Planning Rule Requirements, Including the Regional Framework Plan and the Regional Transportation Plan

1. Overview

State law provides for adoption of findings to demonstrate that a decision complies with applicable laws and standards. The Regional Transportation Plan has been adopted by the Metro Council and acknowledged by the State's Land Conservation and Development Commission. Accordingly, the following findings are intended to demonstrate how a specific proposed amendment of the Regional Transportation Plan is consistent with State law, especially State Planning Goals, as well as Metro land use and transportation policies as included in the Regional Framework Plan and Regional Transportation Plan.

Proposed addition and realignment of Light Rail in downtown Portland Transit Mall, extension to Lincoln, and re-designation of "Proposed Light Rail" to "Planned Light Rail" from Portland Central City to Lake Road Terminus south of Milwaukie



Proposed Change from "Rapid Bus" to "Planned Light Rail" for Segment along I-205 From Gateway to Clackamas Regional Center

Proposed Deletion of "Proposed Light Rail" from Milwaukie Town Center to Clackamas Regional Center

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2 Project Background

High capacity transit (HCT) and light rail (LRT) have a long history in the southeast portion of the Metro region. Between the early 1980s and 1993, the region undertook several System Planning and Pre-Alternative Analysis studies in the North Corridor, South Corridor and Portland Central Business District (CBD). In October 1993, following several local system planning studies and priority corridor studies, the Federal Transit Administration (FTA) issued notice in the *Federal Register* of the intent to publish an EIS for the combined South/North Corridor. Scoping included an evaluation of a wide range of mode, alignment and terminus alternatives. At the conclusion of Scoping in December 1993, the range of alternatives was narrowed based on initial technical analysis and public comment. The project then completed three narrowing steps that led to the selection of alternatives described and considered within the *South/North DEIS*: 1) Tier I Narrowing of Terminus and Alignment Alternatives; 2) Tier I Design Option Narrowing; and 3) Cost-Cutting. Each of these three steps included:

- The adoption and application of a wide range of criteria and measures;

- The development and documentation of technical analysis of the costs, the transportation and environmental benefits and impacts of the project alternatives; and
- An early and pro-active public involvement program, including a public comment period prior to narrowing and a local selection process, which included the involvement of the South/North Citizen Advisory Committee (CAC), the Steering Committee and the participating jurisdictions and agencies.

In November 1995, the Metro Council adopted the *South/North Major Investment Study (MIS) Final Report* which documented the project's compliance with the FTA's and FHWA's *Major Metropolitan Planning Rule*. The *MIS Final Report* included the selection of the design concept and scope of the LPA for the South/North Corridor.

During the period 1995-2000, regional land use and transportation planning was also underway and coordinated with specific HVY and LRT planning. Both the South and North Corridors were identified in the Metro Council adopted Regional Framework Plan (RFP) as planned LRT or future HCT corridors. Specifically, the segment along I-205 from Gateway to Clackamas Regional Center was identified as potential HCT facility in the 2040 Growth Concept Map of the Regional Framework Plan. In the Regional Transportation Plan (RTP) this I-205 segment from Gateway to Clackamas Regional Center was designated as Rapid Bus. Each of these documents (the RFP and the RTP) was also acknowledged by the Land Conservation and Development Commission as meeting State Planning Goals and the Transportation Planning Rule.

In April 1996, the FTA concurred that Metro had met the federal MIS requirements for the South/North Corridor, and approved Metro's request to advance the corridor into preliminary engineering (PE) concurrently with the preparation of the *South/North Draft Environmental Impact Statement (DEIS)*.

The *South/North DEIS* was published in February 1998. The purpose of the DEIS was to summarize the benefits, cost and impacts associated with the alternatives and to provide citizens, agencies and jurisdictions with information needed to make an informed judgment when selecting the Locally Preferred Alternative (LPA) to advance into the PE/FEIS stages of project development. Following the publication of the DEIS, there was an approximately 6-week public comment period and three public hearings were held. Upon closure of the public comment period, local jurisdictions, project committees and the Metro Council selected the Full-Length light rail alternative from Clackamas Regional Center to Vancouver as the LPA, with South Corridor identified as the first construction segment. In November 1998, the voters of the region did not re-approve the primary local match for the South/North Project and the region was required to reassess the project.

Following the defeat of the local funding measure, a series of "listening posts" were held where elected officials from Metro, Tri-Met and the jurisdictions in the region solicited comments and input from citizens around the region regarding how the region should proceed with transit solutions in the South and North Corridors. Following the "listening posts" a group of business leaders and citizens requested that a revised Full-Interstate

Avenue Alternative in the North Corridor be evaluated as a smaller and lower cost project. An SDEIS, focusing on the North Corridor Interstate Avenue Alternative, was published in April 1999. Following a public comment period and public hearing, in June 1999 the Metro Council amended the LPA and defined the North Corridor Interstate MAX Light Rail Project as the first construction segment for the South/North Corridor and selected the new Full-Interstate Alignment Alternative. The *North Corridor Interstate MAX Light Rail Project FEIS* was published in October 1999. The North Corridor Project is currently under construction and expected to begin operations in September 2004.

Following the “listening posts” and amendment to the LPA for the North Corridor Interstate MAX Project, the region refocused on Transportation Alternatives in the South Corridor. The South Corridor Transportation Alternatives Study (SCTAS) was initiated by the Metro Council to examine non-light rail alternatives. The purpose of the SCTAS was to develop, evaluate and establish priorities for non-light rail transportation options that were responsive to community needs and the travel demand in the South Corridor that could be implemented expeditiously and moved forward into advanced design, environmental analysis and construction. The SCTAS examined the following eight alternatives: No-Build Alternative, Radial Commuter Rail Alternative (Oregon City – Portland), Circumferential Commuter Rail Alternative (Milwaukie – Beaverton), River Transit Alternative, High Occupancy Vehicle (HOV) Lanes Alternative, High Occupancy Toll (HOT) Lanes Alternative, Bus Rapid Transit Alternative (BRT), and Busway Alternative.

Based on the findings in the October 2000 *South Corridor Project Evaluation Report*, the South Corridor Study Policy Group (a committee of elected and appointed officials in the South Corridor) narrowed the list of alternatives to be studied further in the South Corridor SDEIS. The Policy Group determined that HOV lanes, HOT lanes, Commuter Rail and River Transit did not meet the study’s Purpose and Need and should not be studied further. In addition, after hearing from citizen groups in Southeast Portland, Milwaukie and Clackamas County, the Policy Group decided that the SDEIS should examine both a revised Milwaukie Light Rail Alternative and an I-205 Light Rail Alternative.

An extensive and pro-active public involvement program has been conducted throughout the larger South/North Transit Corridor Study and the preparation the South Corridor SDEIS. The public involvement program has been designed and implemented to meet the FTA’s and FHWA’s goals of providing complete information, timely public notice, full public access to key decisions, and early and continuing involvement of the public (23 CRG Part 450.3161; October 1993). Chapter 6 of the SDEIS, contains a more detailed description of the public involvement activities.

After completion of the SDEIS and consideration of public comments, Metro then prepared a draft Resolution 03-3303, which addressed amending the Locally Preferred Strategy for the South/North Corridor Project to define a two phased major transit investment strategy for the South Corridor, with the I-205 Light Rail Transit project as

the Phase 1 Locally Preferred Alternative followed by the Milwaukie Light Rail Transit Project in Phase 2. Among other actions, it directed staff to prepare an amendment to the Regional Transportation Plan to include the I-205 LRT project. Public notice was again given and public hearings were held. Metro Council also adopted Resolution No. 3290, endorsing the Metropolitan Transportation Improvement Program for a Regional Funding Plan that included the I-205 LRT project between the Gateway and Clackamas regional centers.

Local governments reviewed this project and draft resolution. Each local jurisdiction in which the proposed project is located or in which the second project phase is located has expressed support for the project. Resolutions in support have been received from the cities of Milwaukie, Oregon City and Portland and from Clackamas and Multnomah counties. In addition, a resolution of support was received from Tri-Met and a letter of support from ODOT. Finally, the Joint Policy Advisory Committee on Transportation, JPACT, with representatives from throughout the region as well as state and Federal agencies also recommended approval of this project.

3 Proposal

On April 17, 2003, after consideration of all testimony, the Metro Council held a final hearing on resolution 03-3303 and by unanimous vote, approved the resolution that among other items, adopted an amendment of the South/North Corridor Project LPS and directed that an amendment of the RTP, specifically I-205 Light Rail Transit from Gateway to Clackamas Regional Center, be prepared for Metro Council consideration.

Accordingly, Ordinance 03-1007 was written to consider this amendment to the RTP. Exhibits A and B provide the detailed proposed map and text changes. Public notice and opportunity for public testimony were again provided. In addition, local, state, special district and federal government land use and transportation staff representatives as well as local elected officials, as members of the Transportation Policy Alternatives Committee, the Joint Policy Advisory Committee on Transportation, the Metro Technical Advisory Committee and the Metro Policy Advisory Committee reviewed and made recommendations concerning Ordinance 03-1007.

4 Statewide Planning Goals

4.1 Goal 1: Citizen Involvement

Three community involvement work efforts that provided opportunities for citizen involvement with regard to various transit options in the subject area have been conducted over the past ten years or so (South/North, South Corridor and SDEIS). For the sake of brevity, only the SDEIS citizen involvement efforts are addressed in this document. Chapter 6 of the SDEIS provides a summary of citizen outreach efforts.

Project staff prepared the SDEIS and conducted citizen involvement between June 2001 and February 2003. Metro staff prepared a Project Public Involvement Plan (PPIP),

presented it to the Metro Committee on Citizen Involvement (MCCI). MCCI reviewed the document and made recommendations and staff responded to recommendations. This reviewed plan for public involvement constituted the initial blueprint for reaching the public and ensuring that public comments were reviewed and considered in each phase of the project.

After a process involving citizens from throughout the study area, it was determined that localized advisory groups rather than the larger Citizen Advisory Committee would better reflect the philosophies and interests of the various community segments. These local advisory groups met regularly in Milwaukie, inner Southeast Portland, Downtown Portland, Gateway, and outer Southeast Portland. Local advisory groups worked closely with staff to learn about the alternatives and identify areas of community concern as well as worked to build community consensus about the alternatives under consideration.

Staff also organized corridor-wide assemblies as opportunities for representatives from local advisory groups, neighborhoods and communities throughout the corridor to exchange information, learn about the alternatives and engage in discussions about the alternatives throughout the corridor. Staff also organized segment assemblies, and joint meetings of local advisory groups within each segment, to discuss issues related to the alternatives within each segment of the corridor.

Staff also met with neighborhood, community and civic groups to discuss the project, share preliminary results and engage community members to participate in the selection of a locally preferred alternative as follows:

A list documenting the 176 meetings held between May 31, 2001 and February 4, 2003 with various groups and including a quick meeting summary was prepared and has been made a part of the record. This document demonstrates substantial efforts to meet with all interested parties over an almost two year period.

In potentially impacted areas, staff conducted door-to-door canvassing to inform residents about the study and hosted targeted open houses and meetings. Staff also met frequently with potentially impacted property and business owners.

Key public involvement activities during the formal SDEIS public comment period include:

- **SDEIS.** This SDEIS and the Executive Summary were distributed to a wide range of public resources (including libraries, local governments and agencies), interested people and groups including neighborhood organizations, community groups and local advisory group members. This complete SDEIS was made available to the public on request and provided to a wide range of interested persons and agencies (see Appendix G, List of Recipients of the SDEIS). Other supporting documents for this SDEIS were also made available to the public (see Appendix C, Supporting Documents, SDEIS).

- **Tech Facts and Other Summary Materials.** A variety of summary materials and Tech Fact Sheets were made available. Summary materials were designed to help community members to understand the results of the SDEIS. A newsletter detailing the alternatives and explaining the environmental process was prepared early in the SDEIS process. Another newsletter, was published after the SDEIS was completed, providing results from the SDEIS to engage people in the LPA selection process. A final newsletter was produced after the LPA decision to ensure that interested persons were contacted about the final decision if they did not already know. Staff also regularly updated the South Corridor web site and hotline to include project updates, findings and meeting information. Interested people could add their name to the mailing list, request additional information, or record a comment on either the web site or the hotline. Powerpoint presentations were also created to summarize the data in a clear and understandable way.
- **Briefing document.** A briefing document that summarizes the results of the SDEIS analysis and provides a comparison of the alternatives was provided to the Policy Committee, governing boards of participating jurisdictions and to interested community members to assist in the selection of the LPA.
- **Notification.** Advertisements were placed in local newspapers to announce the availability of this SDEIS, the public comment period, opportunities to learn more about the results of the SDEIS and who to contact for additional information. Notification of public hearings were sent to the project's mailing list and to property owners located adjacent to the study alternatives. More detailed information about the public comment period and related meetings was listed on the project web page and on the transportation hotline.
- **Media briefings.** Members of the media were provided an opportunity to preview the SDEIS findings prior to open houses. Individual briefings with reporters or editorial boards were also scheduled. Many ads, articles or stories about the South Corridor Project were included in various publications including *The Oregonian*, *The Bee*, *The Asian Reporter*, *El Hispanic News*, *The Good Neighbor News*, *The East County News*, *The Milwaukie Pilot*, and other community newsletters and newspapers.
- **Neighborhood Meetings.** Staff attended neighborhood meetings throughout the corridor to discuss the results of the SDEIS. These briefings provided Neighborhood Associations and Community Planning Organizations with an opportunity to understand the SDEIS results prior to making formal comments on the SDEIS.
- **Open houses.** The project hosted a series of open houses early in the SDEIS public comment period. Open houses provided community members with an opportunity to learn about the findings, ask questions of staff and talk with other community members about the project. Staff provided opportunities for comment at each open house.

- **Public hearings.** After the SDEIS was published, the Policy Committee hosted public hearings to hear comments from community members. Testimony from the public hearings was transcribed and summarized along with all public comments in the Public Comment Document. Further, a public hearing was held for Ordinance 03-1007, amendment of the RTP to reflect the South Corridor Project on June 19, 2003.
- **Documentation of Public Comments.** Project staff compiled all comments made during the SDEIS comment period into the Public Comment Document. This report includes a summary of all comments as well as comments received at the January 29 and February 4 2003 public hearings as well as comments received at open houses conducted by Metro in December, 2002, comments received by e-mail, by telephone and other written comments. An index of each individual who provided comments was also included in this document. It was distributed to the public, staff, elected officials and participating jurisdictions. Responses to the comments will be included in the FEIS.

Goal 1 Conclusion A conclusion has been reached based on the facts established by the above referenced documents made a part of the decision record. These facts include the original RTP findings as well as the public involvement plan that was prepared and affirmed by the MCCI at public meetings, that the public involvement plan was implemented during each phase of the project, that both technical and citizen friendly materials were developed and distributed, that a variety of information mediums were used for communication with the public including paid newspaper ads and earned newspaper articles, a telephone hotline, staff/citizen telephone conversations, brochures mailed to property owners, public meetings and open houses, Powerpoint presentations, door-to-door canvassing, information posted on the Metro web, as well as information was distributed to all public libraries in the region. Accordingly, it is concluded that this amendment of the RTP complies with statewide Goal 1.

4.2 Goal 2: Land Use Planning

The 2000 RTP includes policy 4.0 that requires consistency between land use and transportation planning. As an overall policy, it establishes the regional policy direction concerning land use planning and its relationship to transportation and transportation projects. Concerning the specific proposed project and 2000 RTP amendment, the following facts have been considered for the South Corridor Locally Preferred Alternative and Goal 2 of State Planning Goals:

- **Consistency with local plans**
(consistency with regional plans is addressed in section 2, below)

- **Gateway to Clackamas Segment**

This segment links the Gateway Regional Center, the Lents Town Center, and the Clackamas Regional Center along I-205. The majority of this segment is in the City of

Portland; the portion of the segment, generally south of Johnson Creek Boulevard is in Clackamas County.

Local plans that are applicable in the Gateway to Clackamas Segment include the *Portland Comprehensive Plan*, the *Outer Southeast Community Plan*, and the *Clackamas County Comprehensive Plan*. The most intense development is planned for the Gateway Regional Center area at the north end of the segment. Three portions of the Regional Center—Gateway, Mall 205, and 102nd Avenue—are designated for central commercial development, the City of Portland’s most physically intense commercial designation. The Portland Adventist Medical Campus is designated for institutional and residential use. The area flanking 99th Avenue is designated for high-density residential and mixed employment uses. Lands fronting on major east/west streets and 82nd Avenue are generally designated for storefront commercial and general commercial uses. Large areas also have been designated for multi-dwelling residential uses, particularly along transit streets and near commercial services.

The *Outer Southeast Community Plan* identifies the Lents community as a second focal point for more intensive development. The area along SE Woodstock Boulevard is designated for mixed commercial development, and a mixed-use central employment area is identified near the intersection of SE 92nd Avenue and SE Foster Road. Areas are planned for multi-dwelling residential use near the Lents Town Center and I-205. The area south of the Springwater Corridor is generally designated for industrial and central employment uses. Johnson Creek also crosses this segment south of Foster Road. The I-205 bike path and the Springwater Corridor are identified as open space/recreational trails.

In Clackamas County, areas east of I-205 are generally designated for medium-to-high density residential use closer to the freeway, with lower-density residential areas further east and up the hill. Plan designations are more varied to the west of I-205, with low-, medium-, and high- density residential; retail and corridor commercial; and Regional Center commercial, office, and planned mixed use.

In comparing existing and planned land uses, the most significant change is envisioned for the area between Sunnyside Road and Monterey Avenue that extends from I-205 west to SE Fuller Road. Land uses in this area are expected to transition over time into a denser mix of commercial, office, and residential uses.

The I-205 LRT between Gateway and Clackamas regional centers is consistent with the following local plans and policies

- The City of Portland’s *Outer Southeast Community Plan*. The Vision Plan illustrates a proposed high-capacity transit line in the I-205 corridor between the Gateway and Clackamas Town Centers. The *Outer Southeast Plan* has been implemented with higher density zoning along transit corridors and near commercial services.
- The *Clackamas County Comprehensive Plan* which includes a transit policy that states the county will work with federal, state, and regional agencies to implement LRT in the I-

205 corridor.

- **Portland to Milwaukie Segment**

This segment links the Portland Central City and Milwaukie Town Center, both mixed-use centers identified in the *Region 2040 Growth Concept*. The segment extends from the southern edge of downtown Portland, across the Hawthorne Bridge, and south along SE McLoughlin Boulevard to downtown Milwaukie. The majority of this segment is within the City of Portland; south of Johnson Creek Boulevard is in the City of Milwaukie.

The Portland to Milwaukie Segment is largely developed, with little difference between existing land use and planned land uses. Local comprehensive plans applicable to this segment include the *Portland Comprehensive Plan*, the *Portland Central City Plan*, and the *Milwaukie Comprehensive Plan*. The *Portland Central City Plan* identifies the area near the west end of the Hawthorne Bridge for high-density central commercial uses as well as a government center. Waterfront Park and the Eastbank Esplanade are identified as open space areas. East of the Willamette River is designated as a large industrial sanctuary, which reflects the City's policy to reserve land for existing and planned industrial uses. A linear corridor along SE Grand Avenue is identified as a commercial employment area that allows a broader mix of land uses, including housing. The area around OMSI is designated for a more intensive mix of land uses, including industrial, office, and research and development. A recently adopted development strategy envisions that this area will develop at higher densities than the surrounding industrial sanctuary. South of Powell Boulevard, the Brooklyn Yard area is designated for industrial use, as is the North Industrial Area of Milwaukie. A large portion of the land in this area is planned for park/open space uses, including the Oaks Bottom area along the Willamette River, Westmoreland Park, and Eastmoreland Golf Course. Established single-family neighborhoods are generally designated as inner-city neighborhoods. Some of the major transit streets are planned for higher-density residential development and a greater mix of land uses. Main street development is planned for portions of SE Division, SE Woodstock, SE Milwaukie, and SE Tacoma Streets.

The Portland to Milwaukie LRT segment is consistent with the following local plan policies:

- The Public Transit Policy (6.7) in the *Portland Comprehensive Plan*, which supports reduced travel times on the primary transit network, in the Central City, and in regional and town centers, to achieve reasonable travel times and levels of reliability.
- Policies and objectives in the *Milwaukie Comprehensive Plan* that promote the McLoughlin Corridor as a high priority for transit development.
- Objectives in the *Milwaukie Comprehensive Plan* that support relocation of the Milwaukie Transit Center as redevelopment occurs within the downtown area. The Southgate Crossover Design Option would be a larger site in a location that would better integrate the transit center, park-and-ride lot, and light rail station with the downtown area than would the Milwaukie Middle School Terminus Option.

- The Lake Road Terminus Option includes an additional LRT station and small parking structure at the south end of downtown Milwaukie. The Lake Road Terminus Option provides more extensive transit accessibility to households and jobs than the Milwaukie Middle School Terminus Option. The Lake Road Station and park-and-ride structure also could help facilitate mixed-use development consistent with the *Milwaukie Downtown Plan* and possibly provide shared-use parking opportunities for the downtown area.

- The *Clackamas County Comprehensive Plan* transit policy that emphasizes corridor or roadway improvements to increase transit speed, convenience and comfort.

- The *Clackamas County Comprehensive Plan* transit policy that states the county will work with federal, state, and regional agencies to implement LRT in the downtown Portland to Milwaukie segments.

- **Milwaukie to Clackamas Segment**

This segment concerns access between the Milwaukie Town Center and the Clackamas Regional Center. The majority of this segment is in the City of Milwaukie; the eastern part is in unincorporated Clackamas County.

Local comprehensive plans applicable in the Milwaukie to Clackamas Segment include the *Milwaukie Comprehensive Plan* and the *Clackamas County Comprehensive Plan*. The *Milwaukie Comprehensive Plan* identifies a mix of Retail Storefront, Office, Residential and Open Space uses for the downtown area. East of the Milwaukie downtown, established residential neighborhoods to the south of Highway 224 and north of SE Railroad Avenue are designated for residential use.

The large employment area between SE Railroad Avenue and Highway 224 is planned for business/ industrial park uses in the Milwaukie and Clackamas County plans. The designated industrial area extends east to I-205. The area south of SE Harmony Road that is currently developed with the OIT and CCC campuses and the Aquatic Park is designated for office/commercial use. South of these facilities, the undeveloped area owned by the North Clackamas Park District is designated for public/community use.

The most extensive commercial and mixed-use development is planned for the Clackamas Regional Center at the east end of this segment. The area near the Sunnyside/I-205 interchange is generally designated for Regional Center commercial and office uses. The regional mall and the area west of SE 82nd Avenue and south of Monterey Avenue are designated for mixed-use development. The *Clackamas Regional Center Area Design Plan* identifies areas for low-, medium-, and high-density residential development, with the highest densities planned near commercial uses and transit services.

As noted in the Locally Preferred Alternative adopted April 17, 2003, "With both I-205 and Milwaukie LRT lines implemented in the corridor, local bus service would be maintained or improved in this segment. The trips in this segment traveling through to

central Portland would either travel east to access I-205 Light Rail or travel west to access Milwaukie Light Rail. With this service concept, BRT-type treatments, which facilitate transit travel through this segment, would not be needed." Deleting proposed light rail from the RTP would be compatible with the Locally Preferred Alternative, as transit service would be provided as noted above. In addition, land use goals for the Milwaukie town center and Clackamas regional center could still be achieved through the provision of Light Rail Transit in the I-205 alignment and in the segment from downtown Portland to Milwaukie. Resolutions of support for the Locally Preferred Alternative from the city of Milwaukie and Clackamas County also indicate consistency of no Light Rail between Milwaukie town center and Clackamas regional center with local plans.

- **Identification of issues and problems, inventories and factual information**

In order for the public, interested parties and the Metro Council to assess the import of a proposed plan, it is vital to provide a base of information upon which to form recommendations and make decisions. There is a wealth of information about a wide range of issues related to this project that have been gathered, analyzed and documented in the SDEIS and other related and referenced documents. The information gathered included:

Definition of the South Corridor, Project History and Decision Making Process, Purpose and Need for the Proposed Action, Alternatives Considered, Transportation Impacts including Transit Impacts and Traffic Impacts, Environmental Consequences including Land Use and Economic Impacts, Community Impacts, Visual Impacts, Air Quality Impacts, Noise and Vibration Impacts, Ecosystems Impacts, Water Quality and Hydrology Impacts, Energy Impacts, Evaluation of the Alternatives, Financial Feasibility Analysis, Effectiveness Evaluation, Social Equity Considerations and Issues to be Resolved.

- **Coordination with Local Governments**

There are several means by which coordination with local governments was accomplished. A South Corridor Policy Committee and South Corridor Technical Committee were formed from the locally affected jurisdictions including the City of Milwaukie, the City of Oregon City, the City of Portland, Clackamas County, Multnomah County, Oregon Department of Transportation, Metro and TriMet. These committees reviewed each step of the project, guiding the formulation of the final product. In addition to this joint review, each entity also considered all of the data and the draft Locally Preferred Alternative and approved resolutions of support that are included in the decision record.

Secondly, the Transportation Policy Alternatives Committee (TPAC), a committee of primarily transportation planners from throughout the region reviewed all steps of the project for technical soundness. In addition, the Joint Policy Advisory Committee (JPACT), comprised of primarily elected officials from throughout the region, reviewed and approved each step. (While the SDEIS and LPA were reviewed and recommended

for approval by TPAC and JPACT, the RTP amendment incorporating these changes into the RTP, will again be brought to these bodies for their consideration.)

Finally, more informal discussions with staff and policymakers from a variety of other agencies were contacted and coordination achieved. This list is as follows:

Federal, State and Local Agency Coordination Summary	
Agencies	Topic
U.S. Army Corps of Engineers	Wetlands Hydrology/Water Quality Geology/Soils
Federal Highway Administration	Hydrology/Water Quality Wetlands Traffic Air Quality Energy Displacements/Relocation Highway Improvement Plans Historic Resources Noise and Vibration Capital Cost Estimates
Federal Emergency Management Agency	Hydrology/Water Quality Floodplains
U.S. Department of Energy	Energy
U.S. Department of the Interior, Geological Survey	Hydrology/Water Quality Geology/Soils Visual Impact Assessment
U.S. Department of the Interior, Park Service	Parklands
Advisory Council on Historic Preservation	Historic/Cultural Resources
U.S. Environmental Protection Agency	Wetlands Air Quality Hazardous Materials Noise Environmental Justice
U.S. Fish and Wildlife Service	Threatened and Endangered Species
U.S. Soil Conservation Service	Wetlands Geology/Soils
Bonneville Power Administration	Energy
National Marine Fisheries Service	Threatened and Endangered Species
Northwest Power Planning Council	Energy
Division of State Lands	Hydrology/Water Quality Wetlands
Department of Fish and Wildlife	Wetlands Threatened and Endangered Species Wildlife/habitat
Department of Energy	Energy
Department of Environmental Quality	Hydrology/Water Quality Wetlands Air Quality Energy Hazardous Materials Noise and Vibration

Department of Transportation	Hydrology/Water Quality Wetlands Traffic Hazardous Materials Air Quality Energy Geology/Soils Displacements/Relocations Highway Improvement Plans Historic Resources Noise and Vibration Capital Cost Estimates
State Historic Preservation Office	Historic and Archaeological Resources
Department of Geology and Mineral Industries	Geology/soils Seismic/earthquakes
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City of Portland, City of Milwaukie, City of Oregon City, City of Gladstone and Clackamas County	Wetlands Hydrology/Water Quality Fish and Wildlife Land Use and Economic Development Historic Resources Displacements/Relocations Transportation Plans and Traffic Noise and Vibration Visual Resources Historic and Archaeological Resources Neighborhoods Hazardous Materials
Metro	Land Use Flood Plain Hydrology/Water Quality Wildlife Habitat Threatened and Endangered Species Traffic Transit Seismic/earthquakes Wetlands
Pacific Northwest Utilities Conference Committee	Energy
TriMet	Capital Costs Operations and Maintenance Costs Transit Operating Plans Transit Facility Design Facility and Operation Guidelines
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Columbia River Inter-Tribal Fish Commission	Cultural Resources Fisheries
Grand Ronde Tribe	Cultural Resources
Siletz Tribe	Cultural Resources
Warm Springs Tribe	Cultural Resources
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Source: Metro and TriMet: July 2002.

- **Accessible Documents**

The SDEIS was distributed to public libraries in the area including copies sent to the Clackamas County library, the Milwaukie Ledding Library, the Multnomah County library and the Portland State Library. Copies were also sent to all affected or interested cities, state agencies, Federal agencies, neighborhood agencies and other interested parties as noted on pages F-1 and F-2 of the SDEIS. Facts included under Goal1 provide information about other documents and how they were made accessible.

- **Effectiveness**

The proposed I-205 LRT segment from Gateway to Clackamas regional center was evaluated against 4 other alternatives that were proposed by the public from scoping sessions.

The I-205 LRT Alternative is concluded to be more than adequate to implement the plan because it would:

- provide the highest transit ridership of all the alternatives for this segment, and would carry over 33,000 trips in 2020, the highest of any individual alternative considered in the SDEIS;
- save transit travel time; 12 minutes between the Rose Quarter Transit Center and the Clackamas Town Center Transit Center compared to the No-Build Alternative;
- support the Region 2040 Growth Concept by offering high capacity transit connections between the Gateway Regional Center and the Clackamas Regional Center while serving the Lents Town Center as well as connecting directly to the Portland Central City;
- provide excellent opportunities for transit oriented development in support of the Region 2040 Growth Concept in the Gateway Regional Center, the Lents Town Center and the Clackamas Regional Center;
- be constructed with minimal residential and business displacements, property acquisition and related costs, this would be accomplished by using existing right of way acquired during earlier freeway construction ; and
- provide regional transit connections to the airport, Gresham, downtown Portland, the Lloyd District, Beaverton, Hillsboro and other areas served by the regional light rail system.

The downtown Portland Mall Light Rail alignment is more than adequate to implement the plan because it would:

- ensure improved service quality on both downtown LRT alignments by providing greater capacity and reliability on the second alignment in downtown Portland in addition to the Cross Mall.
- reinforce 30 years of transportation and land use policy. Since the adoption of the 1972 Downtown Plan, the Portland City Council and downtown business community has continuously reaffirmed that the Portland Mall is the preferred location for a light rail alignment. Public and private investment decisions have been made in downtown over the last 30 years that support transit access on SW 5th and 6th avenues and auto and truck access along SW 4th and SW Broadway.

- serve two important downtown destinations including Union Station and Portland State University;
- not limit service expansion options as the Cross Mall alignment would and the cross mall alternative would eventually decrease service quality with the addition of trains needed for system growth;
- be consistent with the Portland Mall being selected as the South/North Corridor Project LPA in 1998 after significant public and technical analysis;
- be responsive to considerable public support for a Portland Mall alternative as indicated during the South Corridor Project public comment period, especially from the downtown community; and
- would be concurrent with the Mall Rehabilitation Project, which is needed to facilitate the City of Portland's desired retail strategy.

The downtown Portland to Milwaukie Light Rail alignment is more than adequate to implement the plan because it would:

- have the highest number of transit trips in this segment for year 2020 of any alternative, adding over 20,000 light rail trips in addition to I-205 light rail for a combined total of over 53,000 daily light rail trips in the South Corridor;
- provide the fastest travel time of any of the Alternatives between Milwaukie and downtown Portland;
- provide opportunities for transit oriented development in its LRT station areas in southeast Portland and in downtown Milwaukie;
- provide better neighborhood transit service than the BRT or Busway Alternatives, by providing accessible, high-capacity transit service to Southeast Portland neighborhoods, Milwaukie and downtown Portland;
- be consistent with significant community support in Milwaukie, southeast Portland and downtown Portland. For example, the Milwaukie Neighborhood Leaders have actively engaged their community and City Council over a period of two years in a grass-roots effort to identify light rail alignments that fit with community goals;
- have fewer environmental and displacement impacts than the Busway Alternative; and
- be compatible with and would augment the regional light rail transit system offering direct service to downtown Portland, the Rose Quarter and north Portland as well as easy transfers to the Blue and Red Lines between Hillsboro, downtown Gresham and the Portland Airport.

Deletion of the Milwaukie to Clackamas Light Rail is adequate to implement the plan because:

- with this service concept (I-205 LRT and Portland to Milwaukie LRT), BRT-type treatments, which facilitate transit travel through this segment, would not be needed. With both I-205 and Milwaukie LRT lines implemented in the corridor, local bus service would be maintained or improved in this segment. The trips in this segment traveling through to central Portland would either travel east to access I-205 Light Rail or travel west to access Milwaukie Light Rail.

- TriMet could work with the neighborhoods in this segment (along with the City of Milwaukie and Clackamas County) to explore improvements to the local bus service in this segment. Improvements could include new routes, route modifications and improved service frequency. This could occur as the I-205 and Milwaukie LRT alignments move toward implementation,

- **Opportunities of review and comment**

Citizens and affected government units was provided as follows:

- documents were made available including public comments on the South Corridor Project SDEIS made during the public comment period and at the public hearings and as documented in the *South Corridor Project Public Comment Report* (Metro, February 2003); and data and analysis included in the *South Corridor Project Supplemental Draft Environmental Impact Statement* (Metro, December 2002) and the *Downtown Light Rail System Analysis* (TriMet and Metro, December 2002);

- Open houses were held on December 9, 10 and 11, 2002.

- Public hearings were held by the Metro Council on January 29, 2002 and February 4, 2003.

- The South Corridor LPA recommendation was made by the South Corridor Project Policy Committee on February 13, 2003.

- Local governments took public actions on the following dates:

The City of Oregon City Commission on March 19, 2003

The City of Portland Council on March 19, 2003

The Multnomah County Board of Commissioners on March 20, 2003

The TriMet Board of Directors on March 26, 2003

The Clackamas County Board of Commissioners on March 27, 2003

The Milwaukie City Council on April 1, 2003

The Transportation Policy Alternatives Committee made its recommendations on March 28, 2003, the Joint Policy Advisory Committee on Transportation made its recommendations on April 10, 2003.

- A letter of support for the project was sent from the ODOT Region 1 Administrator.
- The Metro Council held a final public hearing on April 17, 2003 and after hearing final public testimony, took action.
- Metro Council held a public hearing on June 19, 2003 on Ordinance 03-1007, after hearing public testimony and considering it and the recommendations of TPAC, MTAC, JPACT and MPAC, representing local governments in the region.

Goal 2 Conclusion because substantial information and analysis of a wide variety of alternatives was provided and distributed to the public, because substantial opportunities for coordination among local, state and Federal governments was provided, substantial opportunities for public comment was provided and the amendments are more than adequate to implement the plan, it is concluded that this amendment to the RTP is consistent with State Goal 2.

4.3 Goal 3: Agricultural Land

As all aspects of this proposed change are well within the Metro urban growth boundary, the South Corridor proposal does not include any lands zoned and protected for exclusive farm use. Completion of this project will provide for extension of transit to areas that could better accommodate efficient and compact land uses. This could mean that a more compact urban form would be maintained and that less land would be needed for urban uses in the future and less demand for urbanization of agricultural lands would result.

Goal 3 Conclusion The proposed action will not directly impact agricultural lands and is likely to lessen the long-term demand for expansion of the urban growth boundary and urbanization of agricultural lands for a net neutral or positive impact on agricultural lands.

4.4 Goal 4: Forest Land

For the same reasons stated in the agricultural land section, this project is likely to lessen the demand for urbanization of forest lands.

Goal 4 Conclusion The proposed action will not directly impact forest lands and is likely to lessen the long term demand for expansion of the urban growth boundary and urbanization of forest lands for a net neutral or positive impact on forest lands.

4.5 Goal 5: Open Spaces, Scenic and Historic Areas and Natural Resources

As noted in the RTP findings, these resource goals will apply to project development decisions in local TSP for site specific projects. The 2000 RTP is designed to implement the 2040 Growth Concept and applicable regional goals and objectives which apply these statewide goals. Policies 7.0 and 8.0 and section 1.3.4 of the 2000 RTP contain policies which protect open space, scenic and historic and and natural resources.

Specifically to this 2000 RTP amendment, the following documents, or portions of documents address Goal 5: 1) *Supplemental Draft Environmental Impact Statement* (SDEIS), especially Chapter 3.11, Ecosystems, 3.7, Visual and Aesthetic Qualities, 3.9 Historic, Archeological and Cultural Resources, 2) *Ecosystems Results Report*, 3) *Wetland Determination Results Report* 4) *Parklands, Recreation Areas, Wildlife and Waterfowl Refuges Results Report*, 5) *Historic, Archaeological and Cultural Results Report* and 6) *South Corridor Project Locally Preferred Alternative Report*, Metro, April 17, 2003. These documents provide a comprehensive and in-depth investigation into the presence or absence of Goal 5 resources and possible environmental consequences that could occur in conjunction with the proposed project.

An amended EIS will look further at the downtown Portland Mall segment. The Portland to Milwaukie LRT phase may need additional environmental analysis on the Willamette River crossing. The Portland Mall alignment is being updated and is the subject of an amendment to the South Corridor SDEIS. The Caruthers Bridge and Lincoln Street alignments will likely require an update of the environmental analysis prior to moving that project forward. The final EIS will identify possible mitigation measures for all identified resource conflicts for Metro Council consideration.

Wetlands In general, most of the potential impacts to wetlands would be avoided through the current conceptual design, and the remaining impacts would be relatively small for potential projects of this scale. The Milwaukie LRT would result in the filling of less than two-thirds of an acre of wetlands. Only 0.03 of an acre of wetland would be filled under the I-205 LRT alternative. For the Portland Transit Mall LRT segment, no natural resources have been identified to date. As the area has been greatly altered over the course of the past 150 years, it is unlikely that significant natural resources exist within the project segment.

Streams The build alternatives could potentially impact streams bearing fish that are listed as threatened or endangered. The Milwaukie and I-205 LRT Alternatives would impact 58 and 55 feet of streams respectively.

Floodplains For the I-205 LRT possible conflicts between a floodplain and the proposed Flavel Street station have also been identified. The final EIS will investigate mitigation options to resolve this conflict and will consider the cost of redesigning or moving the station compared with environmental consequences.

Water Quality For the Milwaukie LRT detailed designs for storage and treatment of stormwater along the alignment and from the stations and park-and-ride facilities will

need to be completed prior to project construction in order to address water quality and hydrologic issues.

Views For the I-205 LRT, a more general concern about views, neighborhood compatibility and screening around stations will also be addressed in the final EIS.

Historic and Archeological The I-205 LRT alternative would adversely affect one historic. The Milwaukie LRT alternative would adversely affect five historic resources. The I-205 LRT alternative would have the potential to adversely affect one archaeologically-sensitive site. The Milwaukie LRT Alternative would have the potential to affect two possible archaeological sites.

Open Space The I-205 LRT and Milwaukie LRT alternatives would result in the use of the Springwater Trail. The Milwaukie LRT alternative would both result in the use of an informal park or open space at the west end of the Hawthorne Bridge and at the Milwaukie Middle School site.

Mineral Resources The *Geology, Soils and Seismic Impact Results Report* states: "Economic minerals were not identified within the South Corridor study area. Ross Island Sand and Gravel (located on Ross Island) and Willamette Sand and Gravel (on the Clackamas River) are the nearest sites and are approximately ½ mile from the South Corridor study area."

The deletion of proposed LRT from Milwaukie to Clackamas regional center simply removes a specific project. Travel demand would be accommodated by Phases 1 and 2 described above as well as use of existing and future enhanced bus service. No Goal 5 resources would be threatened by this change.

Goal 5 Conclusion Policies are in place in the 2000 RTP that require consideration of Goal 5 resources. The South Corridor projects have been thoroughly assessed for Goal 5 resources and few conflicts found, especially when considering the size and extent of the proposed project. In the consideration and selection of locally preferred alternatives, some of these conflicts were reduced or eliminated. Where there are remaining conflicts, a process of evaluating resolution or mitigation will be conducted that will consider economic, social and energy consequences of protecting or not protecting identified Goal 5 resources in the final EIS and project decision. Accordingly, this proposed amendment of the 2000 RTP is concluded to be consistent with Goal 5.

4.6 Goal 6: Air, Water and Land Resources Quality

As noted in the RTP findings, these resource goals will apply to project development decisions in local TSP for site specific projects. The 2000 RTP is designed to implement the 2040 Growth Concept and applicable regional goals and objectives which apply these statewide goals. Policies 7.0, 8.0, 9.0 described in section 1.3.4 of the 2000 RTP contain policies which protect air, water and land resource quality.

Documents prepared that address Goal 6 issues include the following: 1) *Supplemental Draft Environmental Impact Statement* (SDEIS), especially chapters 3.5 Air Quality, 3.12 Water Quality and Hydrology, 3.13 Geology, Soils and Seismic Impacts, 2) *Air Quality Results Report*, 3) *Water Quality and Hydrology Results Report* 4) *Land Use and Economic Activity Results Report* and 5) the *South Corridor Project Locally Preferred Alternative Report*, Metro, April 17, 2003. A summary of issues is as follows:

Air In 1997, the Environmental Protection Agency (EPA) approved the carbon monoxide (CO) and ozone Air Quality Maintenance Plan (AQMP) for the Portland/Vancouver region. In January 2001, the US Department of Transportation issued its determination of conformity for the Financially Constrained System of the 2000 Regional Transportation Plan (The No-Build Alternative) finding that the RTP supports the purpose of the region's State Implementation Plan (SIP). Consistency with the AQMP requires that CO and ozone levels be kept within Federal and state standards. Under all of the alternatives, Federal and state air quality standards would be met. In addition, each of the build alternatives are estimated to have less volatile organic chemicals (VOC's), Carbon Monoxide (CO) and oxides of Nitrogen (NOx) than the No-Build alternative because fewer vehicle miles traveled are expected with the build alternatives than the No-Build. The I-205 LRT Alternative, along with the Combined Alternative would result in the greatest reductions in each pollutant type, while the Milwaukie LRT Alternative would result in the smallest reduction in emissions.

Water In general, the current design of the alternatives would avoid most of the potential impacts to floodplains. The I-205 LRT alternative would result in 200 cubic yards of fill within the 100-year floodplain, while the Milwaukie LRT would result between 9,200 to over 32,600 cubic yards of fill within the 100-year floodplain (based on the existing 100-year floodplain maps and on the expected modifications to the maps). Metro will be determining mitigation measures to address these consequences, especially given the region's policy for balanced cut and fill which would address water storage/flooding issues and erosion control requirements.

Land The South Corridor alternatives would generally cross land that is already urbanized, and the long-term impacts to the geologic environment of all of the alternatives would consist of: relatively minor changes in topography and drainage patterns; minor settlement of near-surface materials; increased erosion; and potential changes in slope stability. Short-term impacts related to construction of the build alternatives would be relatively minor, limited to stability of partially-constructed slopes, temporary changes to drainage, erosion and sedimentation. Regional policy concerning erosion control would be a part of proposed mitigation measures included in the final EIS.

Goal 6 Conclusion Air quality consequences are positive and land and water resource consequences as a result of construction of these projects can be addressed and a process for addressing them has been established (FDEIS). Accordingly, this 2000 RTP amendment is found to be consistent with Goal 6.

4.7 Goal 7: Areas Subject to Natural Disasters and Hazards

The 2000 RTP is not intended to directly affect these topics. The RTP is a systems level plan that is very general in nature. Building 2000 RTP facilities is expressly contingent upon a variety of local, state and federal permits that address these topics prior to construction.

Specific documents that were produced that address Goal 7 include: 1) *Supplemental Draft Environmental Impact Statement* (SDEIS), especially chapters 3.13, Geology, Soils and Seismic Impacts, 3.8 Hazardous Materials 2) *Geology, Soils and Seismic Results Report*, 3) *Hazardous Materials Results Report* and 4) *South Corridor Project Locally Preferred Alternative Report*, Metro, April 17, 2003.

As noted above in the Land section of Goal 6, the long-term impacts to the geologic environment of all of the alternatives would consist of: relatively minor changes in topography and drainage patterns; minor settlement of near-surface materials; increased erosion; and potential changes in slope stability. Short-term impacts related to construction of the build alternatives would be relatively minor, limited to stability of partially-constructed slopes, temporary changes to drainage, erosion and sedimentation. Regional policy concerning erosion control would be a part of proposed mitigation measures included in the final EIS. Further, the *Geology, Soils and Seismic Impact Results Report* states: "Review of the slope instability map indicates that the various alternatives would not cross areas mapped as high hazard for seismically induced slope instability. Varying amount of each segment within the study areas have areas where potential for liquefaction and ground motion amplification hazards are high." Further, it states "The potential for major landslides within the South Corridor is limited. The topography within the study area is relatively gentle, and the geologic conditions are generally favorable."

Existing hazardous waste sites and facilities on or near the proposed transit improvements could present a low-level risk to the project during construction. Clean up of hazardous sites would be completed prior to construction related to transit improvements. The number of hazardous waste sites that would be displaced by the alternatives is I-205 LRT (Gateway to Clackamas regional center only) - 0 Federal or state sites and Milwaukie LRT - 0 Federal listed sites and 7 state listed sites.

Goal 7 Conclusion: Linear transportation facilities (roads, rail lines, trails, etc.) traverse extensive areas and often must cross areas with less than the best natural and human activity conditions free of hazards. However, this amendment to the 2000 RTP is located such that is located on generally favorable geologic conditions and all hazardous sites associated with human activity will be cleaned up prior to construction of the projects. Accordingly, it is found that the proposed amendments are consistent with Goal 7.

4.8 Goal 8: Recreational Needs

The 2000 RTP addresses recreational needs by identifying transportation system improvements that will enhance the level of mobility and improve access to recreational sites for citizens and visitors. Bicycle and pedestrian policies in Section 1.3.5 as well as bicycle, pedestrian and multi-use path improvements identified in Appendix 1.1 contribute to access to recreational sites as well as providing recreation along the transportation facility.

Specific to the proposed 2000 RTP amendment for South Corridor light rail, the following documents that address this goal include: 1) *Supplemental Draft Environmental Impact Statement* (SDEIS), especially chapter 3.10 Parklands and Recreation Areas, 2) *Parklands, Recreation Areas, Wildlife and Waterfowl Refuges Results Report* and 3) *South Corridor Project Locally Preferred Alternative Report*, Metro, April 17, 2003

The I-205 LRT and Milwaukie LRT alternatives would result in greater use of the Springwater Trail. The Milwaukie LRT alternative would both result in the use of an informal park or open space at the west end of the Hawthorne Bridge and at the Milwaukie Middle School site. Mitigation of these impacts will be identified and considered as a part of the final EIS.

In addition, it should be taken into consideration that the construction of these LRT alternatives would also increase accessibility to these and other recreational facility destinations throughout the region, including Forest Park which includes the Oregon Zoo, the Forestry Center, the Children's Museum, the Japanese Garden and is the largest urban park in the nation. Other small and large parks and recreational destinations such as OMSI, would also become accessible via the light rail system. This would be especially important for those too young or old to drive an auto or those unable to secure a license to operate a motor vehicle or those unable to afford one.

Goal 8 Conclusion There are potentially some adverse consequences to recreational needs due to the use of some portion of several existing open space facilities. Mitigation measures will be identified and considered during the final EIS. Alternatively, there are substantial potential increases in accessibility to recreational facilities within the region with the construction of these transportation facilities. Accordingly, this amendment to the 2000 RTP is found to be consistent with Goal 8 because on balance, more recreational opportunities are provided than lost.

4.9 Goal 9: Economic Development

As noted in the findings for the 2000 RTP, there are a number of policies that contribute to and promote economic development. These include Section 1.2.1 that identifies industrial areas and intermodal transportation facilities as primary components of Metro's 2040 Growth Concept and which are the highest priority in the 2000 RTP for transportation system investments. Centers, including the Central City, regional and town centers are also key elements of the region's economic development.

Specific to the South Corridor amendments to the 2000 RTP, the following documents have been included in the decision record and relate to Goal 9: 1) *Supplemental Draft Environmental Impact Statement (SDEIS)*, especially chapters 3.1 Land Use and Economic Activity, 3.2 Land Acquisition, Displacements and Relocation of Existing Uses and chapter 4 Transportation Facilities, Services and Impacts, 2) *Land Use and Economic Activity Results Report* and 3) *South Corridor Project Locally Preferred Alternative Report*, Metro, April 17, 2003.

The Portland/Vancouver metropolitan region's economy has been growing and diversifying. While transit has not been shown to directly affect regional economic growth, the quality of the overall transportation system does influence economic activities and location decisions. Each of the build alternatives would expand transit service and transportation options in the South Corridor, improve the effectiveness of the overall transportation system, and thereby help maintain the region's economy.

The I-205 LRT connects two regional centers - Gateway and Clackamas regional centers with the Lents town center in between. The Lents town center is the subject of substantial reinvestment and revitalization efforts. The Milwaukie LRT connects the Central City with the Milwaukie town center.

Analysis of the alternatives establishes the fact that each build alternative would contribute to the effectiveness of the overall transportation system in the corridor, and would, therefore, help to maintain the economic growth of the region. The LRT alternatives would have the greatest potential to positively impact regional land use and development patterns by providing a fourth spoke in the region's LRT system, which would provide high capacity transit connections between the Portland Central City and several regional and town centers. Additionally, light rail stations would have the potential to serve as nodes to attract transit-oriented development, more so than the BRT and busway stations. While not directly attributable to light rail transit, employment growth is associated with each alternative. For the I-205 LRT it is estimated that jobs will increase in the vicinity of proposed transit stations as follows:

Estimated Employment Change within ¼ mile of Proposed Stations

	2000	2020	Percent Change	Vacant Acres of land
I-205 LRT	5,978	8,386	40%	195
Milwaukie LRT	9,801	12,140	24%	24

Deletion of proposed light rail from Milwaukie to Clackamas regional center in and of itself would likely be considered to lessen opportunities for economic growth. However, given that the I-205 LRT and Milwaukie LRT are expected to substitute for this link and provide greater accessibility, job growth is not likely to be adversely affected by deletion of this proposed light rail line. Estimates of ridership and population and employment growth for the South Corridor were developed consistent with the region's population and employment forecasts which in turn, were coordinated with the State forecasts for consistency. These forecasts and allocations of expected growth are based upon analysis

of the community's economic patterns, potentialities, strengths, and deficiencies as they relate to state and national trends.

Short-term economic benefits of the build alternatives also would be significant, with the I-205 LRT (Gateway to Clackamas regional center only) resulting in an estimated 3,090 short-term jobs and the Milwaukie LRT resulting in 3,610 short-term jobs.

There are some displacements of existing businesses that have been identified in the analysis. These include 3 businesses that could be displaced in the I-205 LRT segment and 41 businesses that could be displaced in the Milwaukie LRT. Most of the business displacements for Milwaukie LRT are concentrated in the CEID and industrial portions of the Brooklyn neighborhood. Potential mitigation measures are included in the SDEIS. In some circumstances, the design or location of the proposed transit improvements could be modified during Preliminary Engineering to avoid or reduce displacements. Also, some displacements could be reduced by taking only a portion of a property and/or structure, or by modifying the remaining property and/or structure to provide for continued occupancy. Where displacements would be unavoidable, relocation assistance would be available to assist displaced businesses. The project would provide compensation to property owners based on fair market value of the properties in accordance with the State and Federal laws on property acquisition and relocation

Goal 9 Conclusion The economic affects of this proposed amendment are expected to be, on balance, positive and consistent with Goal 9 that calls for provision of opportunities for a variety of economic activities vital to the health, welfare, and prosperity of the region's citizens. This is concluded on the basis of increased accessibility to and from centers - Central City, Gateway and Clackamas regional centers and the Milwaukie and Lents town centers. These centers are one part of the region's approach to providing jobs and shopping opportunities close to where people live. In addition, potential adverse impacts associated with possible existing business displacement will be eliminated, or impacts mitigated through the final EIS process.

4.10 Goal 10: Housing

The 2000 RTP has several policies that support a transportation system that supports the 2040 Growth Concept and encourage a wide range of housing choice. In Policy 4.0, it states "Provide adequate transportation facilities to support a land use plan that implements the 2040 Growth Concept" and Provide transportation facilities that enhance jobs and housings..." In Policy 3.0 Urban Form, it states objectives including "Provide street, bicycle and pedestrian connections to transit routes within and between new and existing residential, commercial and employment areas and other activity centers." "Support mixed-use development to reduce travel demand. Locate housing, jobs, schools, parks and other destinations within walking distance of each other whenever possible."

More specific to the proposed amendment of the 2000 RTP, documents included in the decision record concerning housing opportunity and the proposed South Corridor

amendments include: 1) *Supplemental Draft Environmental Impact Statement (SDEIS)*, especially chapters 3.1 Land Use and Economic Activity, 3.2 Land Acquisition, Displacements and Relocation of Existing Uses, 2) *Land Use and Economic Activity Results Report* 3) *South Corridor Project Locally Preferred Alternative Report*, Metro, April 17, 2003.

Consistent with region-wide estimates of existing (year 2000) and future (year 2020) households that are planned to be accommodated, the following are the estimates for the I-205 and Milwaukie LRT segments. (see table 3.1-6, page 3.22 of the South Corridor SDEIS)

Households, Population and Vacant Lands within ¼ mile of Proposed Stations

Alternative	Number of Stations	Households			Population			Vacant Lands (acres)
		2000	2020	Percent Change	2000	2020	Percent Change	
Portland to Milwaukie LRT	7	1,894	2,265	20%	3,940	5,164	31%	24.3
I-205 LRT (Gateway to Clackamas)	8	2,885	3,600	25%	6,295	8,292	32%	195.4

It should be noted that the estimates of future households and population are consistent with the regional forecasts, which, in turn have been coordinated with State forecasts. Accordingly, there is a consistency between State population forecasts, regional forecasts and population forecasts for the service areas for these South Corridor light rail segments.

Construction of these light rail lines could result in some displacement of some existing residential homes. The I-205 LRT segment could result in displacement of up to 13 residential units and construction of the Milwaukie LRT segment could result in displacement of 1 home. Potential mitigation measures are included in the SDEIS. In some circumstances, the design or location of the proposed transit improvements could be modified during Preliminary Engineering to avoid or reduce displacements. Also, some displacements could be reduced by taking only a portion of a property and/or structure, or by modifying the remaining property and/or structure to provide for continued occupancy. Where displacements would be unavoidable, relocation assistance would be available to assist displaced residents. The project would provide compensation to property owners based on fair market value of the properties in accordance with the State and Federal laws on property acquisition and relocation.

It should also be noted that "Per capita automobile travel is often 20-50% lower in Location Efficient Developments than in automobile-dependent, urban fringe locations. Table 1 summarizes the projected VMT reduction impacts of various Location-Efficient, infill developments." (source: *Location Efficient Development and Mortgages: Taking Advantage of Consumer and Transportation Benefits at Accessible Locations*)

Table 1 Infill VMT Reductions (CCAP, 2003)

Location	Description	VMT Reduction
Atlanta	138-acre brownfield, mixed-use project.	15-52%
Baltimore	400 housing units and 800 jobs on waterfront infill project.	55%
Dallas	400 housing units and 1,500 jobs located 0.1 miles from Dallas Area Rapid Transit (DART) station.	38%
Montgomery County	Infill site near major transit center	42%
San Diego	Infill development project	52%
West Palm Beach	Auto-dependent infill project	39%

The study goes on to state that "Actual travel impacts may vary depending on household preferences and demographics, neighborhood conditions, and travel choices." Location efficient mortgages are being considered for areas well served with transit in the Metro area. For the I-205 LRT and Milwaukie LRT stations and vicinity, transit availability is likely to provide transportation choices and reduction in auto ownership, use and vehicle miles traveled, in turn allowing for a greater percentage of income to be devoted to housing.

Goal 10 Conclusion These proposed amendments anticipate that substantial housing growth (20 percent or more) will occur within ¼ mile of stations that will be served with light rail transit in the next 20 years. In addition, while there are some displacements of existing residential homes, potential mitigation measures have been proposed that will be further analyzed and considered in the Final EIS. Finally, housing affordability may be increased with greater transportation choices and less income going to auto ownership and more available for housing. Accordingly, it is concluded that the proposed South Corridor LRT amendments to the 2000 RTP are consistent with Goal 10 because additional housing is planned and efforts are being made to address adverse impacts on existing housing.

4.11 Goal 11: Public Facilities and Services

The 200 RTP contains the regional TSP that includes public facility plan identification of anticipated projects and rough cost estimates in Appendix 1. This amendment would revise Appendix 1 and include identification of the project segments and rough cost estimates.

Documents placed in the decision record and relied upon to address this goal as it relates to the South Corridor LRT amendments to the 2000 RTP include: 1) *Supplemental Draft Environmental Impact Statement (SDEIS)*, especially chapters 3.1 Land Use and Economic Activity, 3.2 Land Acquisition, Displacements and Relocation of Existing Uses and chapter 4 Transportation Facilities, Services and Impacts (talk to Sharon about

public facility info developed during engineering analysis and coordination with locals), 2) Financial Results Report, 3) *Parklands, Recreation Areas, Wildlife and Waterfowl Refuges Results Report*, 4) *South Corridor Project Locally Preferred Alternative Report*, Metro, April 17, 2003

The proposed amendments provide both public facilities (extensions to the light rail system) as well as providing a public service - high quality urban transit service - within the urban area. The proposed design of these facilities was coordinated with local, state and Federal agencies and will involve further coordination when construction is initiated. A list of organizations and agencies with which these light rail segments were coordinated is included in the discussion above about Goal 2, especially sanitary sewer, stormwater and drinking water agencies. Construction and operation of these light rail segments are consistent with implementation of Metro's 2040 Growth Concept, which calls for the Central City and Gateway and Clackamas regional centers to be served with high capacity transit as well as the Milwaukie and Lents town centers.

Goal 11 Conclusion The South Corridor light rail amendments to the 2000 RTP are consistent with Goal 11, Public Facilities and Services because these projects are urban facilities and services within the Metro urban growth boundary, they greatly strengthen several key centers - Central City, Gateway and Clackamas regional centers and Milwaukie and Lents town centers - by providing high capacity transit service. The project descriptions and project costs have also been identified. In addition, extensive coordination with other public service providers was completed.

4.12 Goal 12: Transportation

The findings for Ordinance 00-869, which adopted the 2000 RTP, provided extensive findings regarding Goal 12 and the Transportation Planning Rule (TPR). All of these findings have also been made a part of the decision record for Ordinance 03-1007 and are relied upon for Ordinance 03-1007, except as they have been amended or enhanced by these findings.

Documents in the decision record which have been used to address Goal 12 considerations as they relate to South Corridor light rail amendments include the following: 1) *Supplemental Draft Environmental Impact Statement (SDEIS)*, especially chapter 4 Transportation Facilities, Services and Impacts, 2) *LRT Report Results Report*, 3) *Traffic Results Report*, 4) *Travel Forecasting Results Report*, 5) *Land Use and Economic Activity Results Report*, 6) *South Corridor Project Locally Preferred Alternative Report*, Metro, April 17, 2003 7) Metro Council Resolution No. 03-3299, For the Purpose of Entering an Order Relating to Compliance with the Urban Growth Management Functional Plan, 8) the 2000 RTP, including the Appendix, 9) the Oregon Transportation Plan, 1992, including the 1997 Oregon Public Transportation Plan and the 199 Oregon Highway Plan.

- **Purpose**

As noted in the TPR (OAR 660-012-0000),

"The purpose of this Division is to implement Statewide Planning Goal 12 (Transportation) and promote the development of safe, convenient and economic transportation systems that are designed to reduce reliance on the automobile so that the air pollution, traffic and other livability problems faced by urban areas in other parts of the country might be avoided."

The purpose statement goes on to state:

"This portion of the rule aims to improve the livability of urban areas by promoting changes in land use patterns and the transportation system that make it more convenient for people to walk, bicycle and use transit, and drive less to meet their daily needs. Changing land use and travel patterns will also complement state and local efforts to meet other objectives, including containing urban development, reducing the cost of public services, protecting farm and forest land, reducing air, water and noise pollution, conserving energy and reducing emissions of greenhouse gases that contribute to global climate change. The result of applying these portions of the rule will vary within urban areas. Some parts of urban areas, such as downtowns, pedestrian districts, transit-oriented developments and other mixed-use, pedestrian-friendly centers, will be highly convenient for a variety of modes, including walking, bicycling and transit, while others will be auto-oriented and include more modest measures to accommodate access and circulation by other modes"

The 2000 RTP provides for a variety of transportation facilities services to serve the differing land uses in the Regional Framework Plan and its 2040 Growth Concept map. These amendments (I-205 LRT and Milwaukie LRT) concern one aspect of the total transportation system - the public transportation system - and some revision of the light rail and rapid bus elements. The proposed amendments will provide public transportation improvements that have been concluded to be the best alternative, considering a wide variety of choices selected after extensive public participation and comment. These alternatives are key transportation elements supporting areas of existing or planned urban mixed use pedestrian friendly centers including downtown Portland, Gateway and Clackamas regional centers and Milwaukie and Lents town centers. Doing so provides this kind of environment while other parts of the region provide or are planned to provide more auto-oriented urban development patterns. The purpose of the South Corridor projects is consistent with the TPR rule.

- **Transportation Planning**

The rule also states that

" transportation planning shall be divided into two phases: transportation system planning and transportation project development. Transportation system planning establishes land use controls and a network of facilities and services to meet overall transportation needs. Transportation project development implements the TSP by determining the precise location, alignment, and preliminary design of improvements included in the TSP. "

These amendments are projects that fit into the larger transportation system and show location, alignment and preliminary design of the improvements. Further detailed work including preliminary engineering and final EIS will be prepared prior to construction, however, the basic preliminary design has been determined. These South Corridor

alternatives are consistent with the transportation planning section of the TPR, being transportation project developments.

- **Preparation and Coordination of Transportation System Plans**

Section 660-012-0015 of the TPR requires preparation and coordination of Transportation System Plans (TSP). The SDEIS was prepared with the Federal Transit Agency and Federal Highway Administration as co-lead agencies, with the U.S. Army Corps of Engineers a cooperating federal agency. At the State level, ODOT participated in review as a member of TPAC and JPACT and sent a letter recommending approval of the LPA. As noted earlier, other agencies from Federal and State agencies were also contacted and coordinated with. Finally, all affected local governments were coordinated with particularly affected cities and counties, with regular meetings of the South Corridor Policy Committee. In addition, each affected local jurisdiction individually considered the draft Locally Preferred Alternative and sent a resolution of support.

The TPR also requires that "*MPOs shall prepare regional TSPs for facilities of regional significance within their jurisdiction.*" It further states that:

"(a) Regional TSPs shall establish a system of transportation facilities and services adequate to meet identified regional transportation needs and shall be consistent with adopted elements of the state TSP; "

The region's light rail system is one that serves or is planned to serve major mixed use centers. As such, it is considered a regionally significant transportation facility. The specific South Corridor alternatives have been assessed for alignment and high capacity transit mode and the Locally Preferred Alternatives were considered to be the best alternatives, considering all relevant factors, including transportation needs and consistency with the existing regional TSP. JPACT, as the MPO for the region recommended approval of the draft Locally Preferred Alternative that the Metro Council approved.

The TPR also states that " Mass transit, transportation, airport and port districts shall participate in the development of TSPs for those transportation facilities and services they provide. These districts shall prepare and adopt plans for transportation facilities and services they provide. Such plans shall be consistent with and adequate to carry out relevant portions of applicable regional and local TSPs. " The Tri-County Metropolitan Transportation District of Oregon also participated in the assessment of the alternatives and adopted a resolution of support for the draft Locally Preferred Alternatives.

The TPR further states that:

"Regional TSPs shall establish a system of transportation facilities and services adequate to meet identified regional transportation needs and shall be consistent with adopted elements of the state TSP;"

The findings for adoption of the 2000 RTP address this issue on the main. Accordingly, these findings will be relied upon for this amendment, except as they relate to the specific to the South Corridor amendments.

The Oregon Transportation Plan has four major goals. Each goal identifies the policies and actions that guide implementation as follows:

A. Goal 1 – Characteristics of the System - To enhance Oregon’s comparative economic advantage and quality of life by providing a transportation system with the following characteristics:

- Balance
- Efficiency
- Accessibility
- Environmental Responsibility
- Connectivity among Modes and Carriers
- Safety
- Financial Stability

B. Goal 2 – Livability - Develop a multimodal transportation system that provides access to the entire state, supports acknowledged and comprehensive land use plans, is sensitive to regional differences, and supports livability in urban and rural areas.

C. Goal 3 – Economic Development - Promote the expansion and diversity of Oregon’s economy through the efficient movement of goods, services and passengers in a safe, energy-efficient and environmentally sound manner.

D. Goal 4 – Implementation - Implement the Transportation Plan by creating a stable but flexible financing system, by using good management practices, by supporting transportation research and technology, and by working cooperatively with federal, regional and local governments, Indian tribal governments, the private sector and citizens.

The Oregon Transportation Plan, Policy 1A, Balance, states that:

"It is the policy of the State of Oregon to provide a balanced transportation system. A balanced transportation system is one that provides transportation options at appropriate minimum standards, reduces reliance on the single occupant automobile where other modes or choices can be made, particularly in urban areas, and takes advantage of the inherent efficiencies of each mode."

The I-205 LRT and Milwaukie LRT were selected based on the facts that I-205 and McLoughlin boulevards provide for auto and freight movements within the corridor and adding light rail would provide mode choice for people, especially between the Gateway and Clackamas regional centers as well as between downtown Portland and Milwaukie. As extensions to a light rail system, these LRT improvements would also allow for other trip movements well beyond the geographic extent of these segments. For example, non SOV trips to the Portland International Airport, Gresham, Hillsboro and points in between would also be possible with these two new light rail line extensions. Given these facts, Policy 1A, has been addressed.

Policy 1B - Efficiency, states that:

"It is the policy of the State of Oregon to assure provision of an efficient transportation system. The system is efficient when (1) it is fast and economic for the user; (2) users face prices that reflect the full costs of their transportation choices; and (3) transportation investment decision maximize the net full benefits of the system. (Full benefits and costs include social and environmental impacts, as well as the benefits of mobility to users, and construction, operations and maintenance costs.) "

The South Corridor SDEIS reviewed a wide range of alternatives, including a no-build alternative as well as a variety of high capacity transit types. After consideration of social and environmental impacts, especially Chapter 3 (Environmental Analysis and Consequences), Appendix B (Environmental Justice Compliance) and the relevant Result Reports (especially the *Community Impact Assessment Results Report*), costs as estimated and documented in Chapter 5 (Financial Analysis and Evaluation of Alternatives) as well as mobility and speed considerations in Chapter 4 (Transportation Facilities, Services and Impacts), the Locally Preferred Alternatives were the I-205 LRT and the Milwaukie LRT.

The Oregon Transportation Plan further states in Policy 1C, Accessibility, that:

"It is the policy of the State of Oregon to promote a transportation system that is reliable and accessible to all potential users, including the transportation disadvantaged, measured by availability of modal choices, ease of use, relative cost, proximity to service and frequency of service."

The LPA states, among others, reasons related to this Goal that were used for selecting the preferred alternatives. As noted in the LPA, the I-205 LRT alternative would:

- provide the highest transit ridership of all the alternatives for this segment, and would carry over 33,000 trips in 2020, the highest of any individual alternative considered in the SDEIS;
- save transit travel time; 12 minutes between the Rose Quarter Transit Center and the Clackamas Town Center Transit Center compared to the No-Build Alternative;
- be constructed with minimal residential and business displacements, property acquisition and related costs, this would be accomplished by using existing right of way acquired during earlier freeway construction

The Milwaukie LRT would:

- have the highest number of transit trips in this segment for year 2020 of any alternative, adding over 20,000 light rail trips in addition to I-205 light rail for a combined total of over 53,000 daily light rail trips in the South Corridor;
- provide the fastest travel time of any of the Alternatives between Milwaukie and downtown Portland;

- provide better neighborhood transit service than the BRT or Busway Alternatives, by providing accessible, high-capacity transit service to Southeast Portland neighborhoods, Milwaukie and downtown Portland;

Considering these facts, policy 1B has been addressed and the South Corridor LRT alternatives are consistent.

Policy 1-D, Environmental Responsibility, of the Oregon Transportation Plan states:

"It is the policy of the State of Oregon to provide a transportation system that is environmentally responsible and encourages conservation of natural resources"

As noted in the Goal 13, Energy Conservation section below, compared to the No-Build Alternative, each of the build alternatives would reduce total regional energy consumption. Under all of the alternatives, Federal and state air quality standards would be met. With regard to air quality, the I-205 LRT and the Milwaukie LRT are estimated to have less volatile organic chemicals (VOC's), Carbon Monoxide (CO) and oxides of Nitrogen (NOx) than the No-Build alternative in part, because fewer vehicle miles traveled are expected with the build alternatives than the No-Build. In addition, potential environmental impacts were carefully inventoried and documented in the SDEIS and elimination or mitigation of many impacts were addressed during alternative selection. A final list of yet-to-be mitigated potential environmental impacts has been completed and will be addressed in the final EIS. Accordingly, this policy was addressed and the projects are consistent with the policy.

Related policies are 1E - Connectivity among places and 1F Connectivity among Modes and Carriers. These policies state:

"It is the policy of the State of Oregon to identify and develop a statewide transportation system of corridors and facilities that ensures appropriate access to all areas of the state, nation and the world"

"It is the policy of the State of Oregon to provide a transportation system with connectivity among modes and between local and state transportation systems."

The I-205 LRT and Milwaukie LRT both parallel state or federal highway/freeways. Interstate 205 right of way is used for the I-205 LRT and Highway 99E is substantially followed by the Milwaukie LRT alignment. However, the LRT will not impede auto traffic along these highways. In fact, the LRT helps reduce congestion on these highways/freeways. Further, construction and operation of the LRT lines will increase transit connectivity not just to the stations included in the segments, but to the other parts of the LRT system including the Portland International Airport, stations near the Amtrak train station and Greyhound bus station and other LRT stations and adjacent uses within the existing LRT system. These LRT segments were also judged to be the best alternatives to serve this corridor with high capacity transit service, considering all factors: Accordingly, it is concluded that this State Transportation Plan policy has been met and the South Corridor LRT segments are consistent with it.

Policy 1G Safety, states:

"It is the policy of the State of Oregon to improve continually the safety of all facts of statewide transportation for system users including operators, passengers, pedestrians, recipients of goods and services, and property owners"

As documented in section 3.14 Safety and Security, the South Corridor light rail segments have been considered for a wide variety of ways to improve safety. These methods include improvements to personal security through transit operator trainings and coordination with other law enforcement entities, emergency response and homeland security responses as well as consideration and avoidance of natural hazards from earthquakes and other potential safety concerns. As a result, it is concluded that these South Corridor LRT amendments have considered and will respond to safety concerns and are therefore consistent with this policy.

Goal 2, Livability, of the OTP states:

"To develop a multi-modal transportation system that provides access to the entire state, supports acknowledged comprehensive land use plans, is sensitive to regional differences, and supports livability in urban and rural areas"

Sub-goals within Goal 2 also express the State's interest in assuring balanced, multi-modal accessibility. Approving these 2000 RTP amendments to allow for South Corridor light rail extensions along I-205 and a downtown Portland to Milwaukie segment, will provide high quality - speed and service frequency - to the public in this corridor and for those who may wish to go a use or uses within this corridor. Each local jurisdiction with land use authority - the cities of Milwaukie and Portland, the counties of Clackamas and Multnomah, all forwarded resolutions of support for these light rail extensions. The extensions are also consistent with the designation of potential high capacity transit facilities within the corridor on the 2040 Growth Concept map. These facilities will also provide accessibility and support for the Central City, Gateway and Clackamas regional centers as well as the Milwaukie and Lents town centers. In doing so, the light rail will support the housing and employment opportunity choices that these centers can provide and the livability that can come with such centers. Accordingly, these facts, along with the earlier facts cited under State Planning Goal 2, supports the conclusion that these light rail extensions are consistent with the OTP Goal 2.

Goal 3 of the Oregon Transportation Plan is:

"To promote the expansion and diversity of Oregon's economy through the efficient and effective movement of goods, services and passengers in a safe, energy efficient and environmentally sound manner."

The proposed amendments to the 2000 RTP concern light rail transit - the conveyance of people. However, because these improvements do have some expected results to reduce future congestion, these improvements could promote the movement of goods as well as passengers. Facts cited within this document under the headings of safety, energy

efficiency and environment provide substantiation of the conclusion that these light rail extensions as well as the deletion of proposed light rail from Milwaukie to Clackamas regional center address these considerations.

The final major goal of the OTP, Implementation, is:

"To implement the Transportation Plan by creating a stable but flexible financing system, by using good management practices, by supporting transportation research and technology; and by working cooperatively with federal , regional and local governments, Indian tribal governments, the private sector and citizens".

While this goal is one for the State, it includes elements that are important for other units of government to follow as well.

The first part of this goal concerns financing. This project's purpose and need statement includes the need to be fiscally responsive. What this has meant in this project is to examine each element for cost implications, recognizing that there are often social, energy or environmental impacts that can justify additional costs, particularly when the long-term, life cycle costs and benefits are considered. Regardless, the result has been to reduce the estimated cost of these projects balancing all factors. For example, the I-205 LRT was able to provide a design that used existing rights-of-ways and therefore be constructed with minimal residential and business displacements, property acquisition and related costs. Further, the Milwaukie LRT would have fewer displacement costs than the Busway Alternative.

In addition, Chapter 5 of the SDEIS includes estimates of both project capital costs and system costs. The Project Capital Funding Analysis "...focuses on whether there are adequate capital resources to construct each alternative, and if not, the options that will be considered in preliminary engineering (the next phase of project development) for resolving the capital shortfall." The System Funding Analysis takes the same approach for each alternative studied for operating costs.

Because the projects have not received all approvals and final funding, issues related to management of these projects is yet to be determined. However, there is public oversight of all phases and aspects of these projects and if they are built, public participation of management practices will be provided through Tri-Met and its board.

With regard to working cooperatively, as noted in the above discussions of State Planning Goals 1 and 2, Metro has worked with the state as well as with federal, local, Indian tribal governments, the private sector and citizens. Representatives of the State participated in several advisory committees, especially JPACT and TPAC, which reviewed these projects over several years and in late 2002 recommended these projects. In addition, ODOT provided a letter of support for the Locally Preferred Alternative.

Within Goal 4, there is policy 4J, MPO and other Regional Responsibilities. This policy states that:

"MPOs... shall define a transportation system of regional significance adequate to meet identified needs for the safe movement of people and goods between and through communities and to regional destinations within their jurisdictions; and

Regional transportation plans shall be consistent with the adopted elements of the state transportation system plan."

As noted in the findings of fact for State Planning Goal 2, section 4.2, above, the subject project was considered for how best the project purpose and need could be addressed, including the safe movement of people and goods through communities and to regional destinations. With regard to being consistent with the adopted elements of the state transportation plan, the 1992 OTP on pages 96 and 97 includes "Additional Projects included in the Preferred Plan". Item 3, "Expanding urban transit service in metropolitan areas", states that

"The level of service prescribed for metropolitan areas in the Minimum Levels of Service is that required to meet the accessibility and balance goals in the OTP for individual travelers. However, this level will not be sufficient to reduce the per capita VMT necessary to meet the LCDC Transportation Goal Rule. To meet that rule, this plan also envisions significant additional investments in metropolitan transit service, including construction of light rail routes in the Portland metropolitan area that are identified in the 1992 Tri-Met Strategic Plan."

The 1997 Oregon Public Transportation Plan was adopted by the Oregon Transportation Commission in April, 1997 as an element of the Oregon Transportation Plan and is the most current version of the modal plan for public transportation in the State. It includes the 2015 service mix (Appendix C, page C-2) for public transportation types, including light rail, as follows:

"Light rail will expand in the Portland area with the opening of the Westside Light Rail line in 1998. A South-North line may be built in the next century." Since the adoption of this Plan, not only has the Westside LRT been opened, but the Airport MAX has opened and Interstate MAX is being completed. Thus the north portion of the South-North LRT has been completed or will be shortly (with the possible exception of extension into Clark County). The South Corridor Project, with the adoption of the LPA in April, 2003, provides a blueprint consistent with the southern portion of the South-North line envisioned in the Oregon Public Transportation Plan. Further, the Oregon Public Transportation Plan states that at service level 3, "responding to State and Federal Mandates and Goals", n "Level 3 would expand services to respond to state and federal mandates and goals in the OTP, Oregon Benchmarks, TPR, 2040 Growth Concept, TransPlan and federal Clean Air Act by: Expanding Portland Area Light Rail" (page V-8)

It further states that: "The 20-year funding for Level 3 services are based on the Oregon Benchmark standards of 1.7 transit service hours per-capita and in the Portland area the Tri-Met Strategic Plan." (page V-9)

TriMet's Transit Investment Plan Annual Update (TTIP), June 2003, which was adopted by the TriMet Board by Board Resolution 03-05-28, supercedes older plans, including the 1992 TriMet Strategic Plan. The TTIP, after maintaining the quality of the existing

system, includes the South Corridor Project as its highest priority. Further, on pages 30 and 31 of the TTIP a detailed description of the South Corridor and how it fits with TriMet's plans to grow transit in the region is included. The TTIP and Metro's RTP with the South Corridor Project revisions that are the subject of these findings are consistent with the South Corridor Project.

- **Elements of Transportation System Plans**

The findings completed for the 2000 RTP provide facts and conclusions that address the elements of the region's transportation system plan and are referenced here to address OAR 660-012-0020. With regard to the South Corridor Project, changes are proposed to the public transportation plan. As the SDEIS states:

"As a result of increased congestion in the South Corridor, transit operating speeds on SE McLoughlin Boulevard, the corridor's primary transit trunkline, have deteriorated. Deterioration in transit travel times means that TriMet must increase service hours and level of service. If transportation network improvements are not made in the South Corridor, these conditions will continue to worsen over time. Under the No-Build Alternative, transit travel times from downtown Portland to the Milwaukie Town Center and the Clackamas Regional Center would increase over 50 percent by 2020."

This statement summarizes the service inadequacies and how the transportation disadvantaged would be further disadvantaged in the future. The South Corridor Project, through the inventory and analysis contained in the SDEIS and in the analysis and conclusions reached in the Locally Preferred Alternative address revised and new planned transit routes, exclusive transit ways, terminals and major transfer station, major transit stops and park-and-ride stations [OAR 660-012-0020 (2)(c) (A) and (C)]. Further, these South Corridor documents provide an inventory and general assessment of existing and committed transportation facilities and services by function, type, capacity and condition (see Chapter 4 of the SDEIS), are consistent with the facility performance acceptable to ODOT and Metro (shown in the letter of support from ODOT and Metro Council adoption) and include a description of the general physical and operational condition of each transportation facility (Chapters 2 and 4 of the SDEIS). [OAR 660-012-0020 (3) (a) (A), (B) and (C)]

The SDEIS and the LPA also provide a description of the type of planned facilities and services and their planned capacities and levels of service (see Chapters 2 and 4 of the SDEIS and the LPA). Further, the SDEIS and LPA provide a description of the location of planned facilities, services and major improvements establishing the general corridor within which the facilities, services and improvements will be sited, including a map showing the general location of the proposed transportation improvements (see exhibit B to Ordinance 03-1007). [OAR 660-012-0020 (3)(b) and (c)].

Based on the facts and conclusions included in this section of the findings, it is concluded that the South Corridor Project is consistent with OAR 660-012-0020.

- **Complying with the Goals in Preparing Transportation System Plans**

This document and the findings of fact and conclusion of law for the 2000 RTP adoption provide evidence for Statewide Planning Goal compliance and acknowledged comprehensive plan policies and land use regulations. The South Corridor Project is not a refinement plan as noted in OAR 660-01200025(4), as it was not "...deferred during transportation system planning...". Rather, this is a revision to the 2000 RTP based on additional detailed information. Accordingly, the South Corridor Project is consistent with this section of the TPR.

- **Determination of Transportation Needs**

This section of OAR 660-012-0030 includes identification of transportation needs and reliance on population and employment forecasts and distributions that are consistent with acknowledged comprehensive plan. Chapter 1 of the SDEIS provides identification of needs and the facts and conclusions contained within the last portion of the section of this finding document dealing with OAR 660-012-0015 addresses the requirement to rely on the analysis of need in the adopted state TSP.

Accordingly, the South Corridor Project is consistent with this section of the TPR.

- **Evaluation and Selection of Transportation System Alternatives**

OAR 660-012-0035 guides how transportation system alternatives should be evaluated and selected. The SDEIS and LPA provide substantial documentation of the steps taken to evaluate and select the locally preferred alternative, including evaluation of improvements to existing facilities and services (busway alternative described in Chapter 2 of the SDEIS and evaluated throughout the SDEIS), new facilities and services, including different modes or combinations of modes that could reasonably meet identified transportation needs (also described in Chapter 2 of the SDEIS and evaluated throughout the SDEIS). Further, the *Local Traffic Impacts Results Report* provides transportation system management measures (see section 2.7 of the report) and the South Corridor Project included a no-build alternative.

Subsections (2) and 3(a) of this section of the OAR calls for evaluation of alternative land use designations, densities, and design standards and that the transportation system shall support urban development by providing the types and levels of transportation facilities and services appropriate to serve land uses identified in acknowledged comprehensive plans. The 2040 Growth Concept, a key element of the Regional Framework Plan, was designed to provide for coordinated land use and transportation planning. As such, the 2040 Growth Concept provides a regional structure for ensuring that land use and transportation are consistent and working together. More specifically to the South Corridor Project, for the Milwaukie LRT alignment, at least from downtown Portland to downtown Milwaukie, the 2040 Growth Concept map shows a high capacity transit alignment and station communities consistent with the South Corridor Project. Accordingly, for this segment, supportive land uses adjacent to transit stops has already been addressed at the regional level and implemented by local jurisdictions. For the I-205 LRT segment, high capacity transit is shown along I-205, with the Gateway regional

center, the Lents town center and the Clackamas regional center are all designed to provide land uses conducive to light rail service. Land use planning for Downtown Portland along the transit mall are also zoned for mixed use development which supports and relies upon high quality transit service. So, for the I-205 LRT, including downtown Portland transit mall, regional land use policy and local zoning implementation have been completed. Some additional land use changes are likely to occur in the near future in conjunction with this element of the South Corridor Project. However, these will be considered after additional information about the transit stations is completed, possible mitigation measures identified and the larger land use implications of other changes (such as the reduction or elimination of proposed station communities shown on the 2040 Growth Concept map between the Milwaukie town center and Clackamas regional center) can all be considered at one time.

Subsections (3) (b), (c), (d) and (e) of this OAR include standards for evaluation and selection. Consistency with air, land and water quality, especially the State Implementation Plan under the Federal Clean Air Act and the State Water Quality Management Plan, is required. The SDEIS includes information about air quality (Chapter 3.5, including air quality regulations and standards, air quality impacts and potential mitigation) and as noted in the findings of fact listed under section 4.6 of this document, the South Corridor Project will comply with all State and federal air quality standards. For water quality, as noted in section 3.12 of the SDEIS and section 4.6 of this document, most potential impacts to floodplains have been avoided. Where impacts haven't been avoided to date, mitigation proposals will be designed and the Project leaders will continue to work with DEQ and DSL at the state level and the Corps of Engineers, EPA and US Natural Resources Conservation Service at the federal level to address water quality issues and comply with all state and federal standards during construction, operation and maintenance. Further, the South Corridor Project analyzed economic, social, environmental and energy consequences and examined ways to minimize adverse consequences (see sections 4.1 through 4.11 and sections 4.13 through 4.15 of this document). As noted earlier in section 4.12 of this document, the South Corridor project alternatives were selected, in part, because they attracted the most number of riders, therefore providing a better balance among modes of travel and avoiding principal reliance on any one mode of transportation and reduce principal reliance on the automobile.

Subsection (4) of this OAR requires that in MPP areas of more than 1 million population, a 10 percent reduction of vehicle miles traveled per capita be achieved within 20 years of local transportation plan adoption. The South Corridor Project will result in fewer vehicle miles traveled than the No-Build alternative. However, both in the South Corridor and in the region compliance with this objective appears to be difficult to achieve. Accordingly, the region was granted approval to use alternative standards as provided for in Subsection (5). As shown on the following table, data which was extracted from the *Travel Forecasting and Transit Analysis Results Report*, table 3.2.7, (page 41) shows: a) substantial increases in the non-automotive (transit) mode over existing levels; b) a significant increase in the availability and convenience of alternative modes of transportation compared to year 2000 conditions; c) a significant increase in the

share of trips by alternative modes, including transit, but also walking and bicycling over existing conditions; and d) a reduction on the reliance on automobiles as follows:

Work and Non-Work Corridor Transit Trips and Transit Mode Share to Central City¹, by Existing and South Corridor Project Alternatives¹, Average Weekday - Year 2020

	Existing (2000)	No-Build	Milwaukie LRT	I-205 LRT
Home-Based Work²				
Transit	16,990	38,090	40,830	41,530
Total Person	63,150	89,830	89,830	89,830
Mode Split	27%	42%	45%	46%
Non-Work³				
Transit	15,890	30,320	31,260	32,180
Total Person	108,550	143,070	143,070	143,070
Mode Split	15%	21%	22%	22%
Total				
Transit	32,880	68,410	72,090	73,710
Total Person	171,700	232,900	232,900	232,900
Mode Split	19%	29%	31%	32%

Source: Metro, 2002.

¹ Central City includes Lloyd District, Central Eastside Industrial District, downtown Portland, North Macadam, Goose Hollow and Northwest Portland. Excludes intra-Portland CBD trips.

² Home-based work trips are defined as trips taken directly between one's home to one's place of work.

³ Non-work trips are defined as all trips that are not home-based work trips.

In addition, when the South Corridor Project elements were run in the region's transportation model for estimates of the year 2020 conditions, there were 66,600 fewer vehicle miles traveled than in the No-Build alternative. Similarly, when the Milwaukie LRT segment was run, there were 20,000 fewer miles traveled.

Further, the findings for the 2000 RTP assumed achievement of street connectivity requirements of Title 6 of the Urban Growth Management Functional Plan that were incorporated into the 2000 RTP. Since that time, the Metro Council has determined full compliance for connectivity standards by local jurisdictions and so recognized this by adoption of Resolution No. 03-3299, entering an order relating to compliance with the Functional Plan. This resolution is included in the decision record. The Metro Council also recognized compliance with reduced parking requirements, another method of managing transportation mode in this resolution. Accordingly, further progress towards a more balanced transportation system has been achieved since the adoption of the 2000 RTP and this directly relates to conditions now and in the future in the South Corridor for reducing vehicle miles traveled and complying with the TPR.

Subsection (6) of OAR 660-012-0035 states that:

"Regional TSPs shall specify measurable objectives for each of the following and demonstrate how the combination selected will accomplish the objectives in section 4 of this rule:

(a) An increase in the modal share of non-automobile vehicle trips (i.e., transit, bicycle, pedestrian); for example, a doubling of the modal share of non-automobile trips;"

(b) An increase in average automobile occupancy...

(c) Where appropriate, a decrease in the number or length of automobile vehicle trips per capita due to demand management programs, rearranging of land use or other means."

As noted in the table included above in the discussion of subsection (5), modal share for transit is expected to increase substantially over the existing rate. In addition, the Clackamas regional center has a transportation demand management program in place.

Further, vehicle miles traveled per capita are estimated to decrease over the No-Build alternative as follows:

Alternative	VTM/ Population	VTM/capita
No-Build (year 2020)	36,248,044/2,325,211	= 15.59
I-205 LRT	36,181,408/2,325,211	= 15.56
Milwaukie LRT	36, 227,975/2,325,211	= 15.58

In addition, the number of automobile vehicle trips per capita due to introduction of LRT in the corridor is estimated to decrease as follows:

Alternative	Auto Person Trips/ Population	Auto Person Trips/capita
No-Build (year 2020)	8,497,915/2,325,211	= 3.654
I-205 LRT	8,484,261/2,325,211	= 3.652
Milwaukie LRT	8,493,140/2,325,211	= 3.649

Subsection (7) concerns interim benchmarks at five-year intervals. The findings for the adoption of the 2000 RTP addressed this subsection and it is too early to be able to produce actual measurements of progress at this time. While not measurements of actual progress, forecasts of future VMT and automotive reliance appear favorable and have been addressed in earlier subsections.

Subsections (8) through (12) do not apply to the subject action.

- **Transportation Financing Program**

OAR 660-012-0040 requires that a financing program be provided with the regional transportation system plan. The findings included with the adoption of the 2000 RTP provide facts and conclusions that address this issue in general. Specific to the South Corridor Project, this action amends the 2000 RTP, providing revised transportation funding information, including an amended list of transportation facilities, as well as amendments to the financially constrained list of projects and the respective changes to figures 1.16, 5.2, 5.9, 5.10 and 5.12 to illustrate the revised project features. In addition, a general estimate of project timing as well as rough cost estimates for the project is included. These are all summarized in the Appendix 1.0 document, page 3 of Exhibit A to Ordinance 03-1007.

- **Implementation of the Transportation System Plan**

This section of the TPR, OAR 660-012-0045, addresses amending land use regulations to implement a transportation system plan. The findings prepared for the adoption of the 2000 RTP generally respond to this section of the OAR. Specific to the South Corridor and as noted above, land use changes were made with the adoption of the 2040 Growth Concept and provide high capacity transit designations, land use plans and regulations that are consistent with the South Corridor Project. The South Corridor Project provides light rail service to the Central City, Gateway and Clackamas regional centers, Milwaukie and Lents town centers. These are all mixed-use centers that are consistent with light rail service. Metro Resolution 03-3299 also demonstrates implementation, as it shows that local governments have complied with connectivity, parking and other Urban Growth Management Functional Plan policies that encourage a more balanced transportation system, including more walkable places which reduce barriers to transit ridership.

Subsections (1) (b) and (c) will be addressed in a separate action, revisions to the Land Use Final Order, which provides for a review and approval process to ensure a consolidated review of land use decisions, including taking into consideration additional information now being gathered about LRT on the Portland transit mall as well as additional information about some of the station community configurations at some of the I-205 LRT stops.

Subsections (2) through (7) are addressed by the original 2000 RTP findings and as these subsections address region-wide, city-wide and county-wide regulations, the South Corridor Project does not change or adverse impact these regulations. Further, regarding subsection (5) and after the adoption of the 2000 RTP, the Metro Council adopted resolution 03-3299, which finds that the implementation measures referred to on page 47 of the findings to Ordinance 00-869A (certain measures included in Metro's Urban Growth Management Functional Plan), have been implemented by the cities and counties within the region.

- **Transportation Project Development**

This section of the TPR (OAR 660-012-0050) requires a coordination process for transportation projects. The 2000 RTP, section 6.7, provides for this process and was acknowledged by the State. The South Corridor Project is consistent with this process (see sections 5 and 6 of these findings, below) and includes some amendments to section 6.7 of the RTP (see Ordinance No 03-1007, Exhibit A, item 5) to reflect the additional information gained and decisions made about the best alternatives as documented in the Locally Preferred Alternative decision of April 17, 2003.

Subsections (3) and (4) of this section of the OAR states:

"3) Project development involves land use decision-making to the extent that issues of compliance with applicable requirements remain outstanding at the project development phase. Issues may include, but are not limited to, compliance with regulations protecting or regulating development within floodways and other hazard areas, identified Goal 5 resource areas, estuarine and coastal shoreland areas, and the Willamette River Greenway. Where project development involves land

use decision-making, all unresolved issues of compliance with applicable acknowledged comprehensive plan policies and land use regulations shall be addressed and findings of compliance adopted prior to project approval. To the extent compliance has already been determined during transportation system planning, including adoption of a refinement plan, affected local governments may rely on and reference the earlier findings of compliance with applicable standards.

(4) Except as provided in Subsection (1) of this section, where an Environmental Impact Statement (EIS) is prepared pursuant to the National Environmental Policy Act of 1969, project development shall be coordinated with the preparation of the EIS. All unresolved issues of compliance with applicable acknowledged comprehensive plan policies and land use regulations shall be addressed and findings of compliance adopted prior to issuance of the Final EIS.."

The South Corridor Project has a draft EIS (SDEIS) for which an amendment is being prepared to address the Portland Transit Mall LRT, as concluded by the Locally Preferred Alternative. There are issues that have been identified in the SDEIS and in some cases, potential mitigation measures. The Locally Preferred Alternative addressed some of these impacts either by rejecting some alternatives or by making adjustments to the original alternative. Some unresolved issues remain and others that will likely be identified in the amendment analysis for the Portland Transit Mall LRT. These issues will be further analyzed in preparation for the final EIS, including identification of potential mitigation measures, if an issue has not already been addressed or potential mitigation not already identified. All potential mitigation measures will then be considered. Prior to adoption of the Final EIS and project approval, all issues will be addressed and findings of compliance will be prepared to ensure compliance with subsections (3) and (4) of OAR 660-012-0050.

Subsection 5 states:

" (5) If a local government decides not to build a project authorized by the TSP, it must evaluate whether the needs that the project would serve could otherwise be satisfied in a manner consistent with the TSP. If identified needs cannot be met consistent with the TSP, the local government shall initiate a plan amendment to change the TSP or the comprehensive plan to assure that there is an adequate transportation system to meet transportation needs."

The Milwaukie to Clackamas proposed light rail line is deleted in the South Corridor Project and removed from the 2000 RTP. This is done because it was found that provision of the I-205 LRT from Gateway to Clackamas regional centers and the Milwaukie LRT from downtown Portland to Milwaukie, will provide sufficient transit service such that only modest improvements to bus service, in conjunction with these LRT extensions, will provide superior transit service in this corridor and the Milwaukie town center to Clackamas regional center proposed light rail is not needed. This conclusion is based on the facts included in the SDEIS and the analysis and conclusions in the Locally Preferred Alternative approved by the Metro Council on April 17, 2002.

Subsection (6) of this OAR is not applicable as the South Corridor project is not a refinement plan and the regional TSP, the 2000 RTP has been completed and acknowledged. The South Corridor Project is an amendment of the TSP and is consistent with the provisions for TSP as addressed elsewhere in this document.

- **Timing of Adoption and Update of Transportation System Plans**

This section of the OAR (660-012-0055) is not applicable to the South Corridor Project or amendment of the 2000 RTP.

- **Plan and Land Use Regulation Amendments**

This section of the OAR (660-012-0060) is addressed in the findings for the adoption of the 2000 RTP. No amendment to a land use functional plan, acknowledged comprehensive plan or land use regulation is proposed as a part of the South Corridor Project at this time. Accordingly, this section of the OAR is not applicable to adoption of Ordinance No. 03-1007.

OAR 660-012-0065, Transportation Improvements on Rural Lands and OAR 660-012-0070, Exceptions for Improvements on Rural Lands, are not applicable as the South Corridor Project does not include rural lands or lands outside the region's urban growth boundary.

Goal 12 Conclusion Based on consideration of the facts in evidence cited above, the South Corridor Project is consistent with Goal 12, Transportation, of the State Planning Goals as well as consistent with the 1992 Oregon Transportation Plan, the 1997 Oregon Public Transportation Plan and the 1999 Oregon Highway Plan.

4.13 Goal 13: Energy Conservation

The facts and conclusions concerning Goal 13 are based on the following documents: 1) *Supplemental Draft Environmental Impact Statement (SDEIS)*, especially chapter 3.6 Energy, 2) *Energy Results Report*, 3) *South Corridor Project Locally Preferred Alternative Report*, Metro, April 17, 2003

Compared to the No-Build Alternative, each of the build alternatives would reduce total regional energy consumption. The reduction in operational energy consumption with the I-205 LRT would be a reduction of 0.464×10^9 British Thermal Units (BTU) per average weekday in 2020), and the Milwaukie LRT Alternative would result in a reduction of 0.101×10^9 BTU per average weekday. Energy consumption for construction of the I-205 LRT would be $2,327.680 \times 10^9$ BTU, with the Milwaukie LRT consuming $2,547.210 \times 10^9$ BTU during construction. This would mean that in a little over a week of operation, the entire energy consumed for construction would be saved.

Goal 13 Conclusion It is estimated that the completion and operation of these light rail lines would provide for substantial energy savings over the useful life of the light rail line. Accordingly, this amendment is concluded to be consistent with Goal 13, energy conservation.

4.14 Goal 14: Urbanization

Documents relied upon to address this goal include: 1) *Supplemental Draft Environmental Impact Statement* (SDEIS), especially chapters 3.1 Land Use and Economic Activity, 3.2 Land Acquisition, Displacements and Relocation of Existing Uses, 3.3 Neighborhoods and Communities, 3.14 Safety and Security, 2) *Visual Quality and Aesthetics Results Report*, 3) *Land Use and Economic Activity Results Report*, 4) *Downtown LRT Results Report*, 5) *Financial Results Report*, 6) *Noise and Vibration Results Report*, 7) *Capital Costs Results Report* and 8) *South Corridor Project Locally Preferred Alternative Report*, Metro, April 17, 2003

Goal 14 requires an orderly and efficient transition from rural to urban land uses and from urbanizable land to urban land. The South Corridor Project will be built entirely within the urban growth boundary (UGB). The project will not influence the transition from rural to urban land use. The project will, however, influence the urbanization of land within the UGB. It will support the provision of housing and employment activities within the UGB consistent with accommodating long-range urban population growth requirements. The I-205 LRT and Milwaukie LRT segments will support numerous mixed use centers, including Portland Central City, Gateway and Clackamas regional centers, Milwaukie and Lents town centers by providing high quality transit service. Forecasts, as noted earlier, are for substantial increases in transit's share of trips within these centers. As noted in the Goal 1 section of this document and the Locally Preferred Alternative, these light rail extensions are the best means of providing high quality transit service within the South Corridor area and as such are orderly and most economic, in part, because they provide the highest transit ridership.

Goal 14 Conclusion The South Corridor Project will provide for more efficient use of land within the Portland Central City, Gateway and Clackamas regional centers and Milwaukie and Lents town centers as well as around many transit stops along the South Corridor Project light rail extensions. The South Corridor Project will provide for orderly and economic provision of light rail transit service and will help support provision of new jobs and housing in mixed use centers and adjacent to many transit stops. Accordingly, the South Corridor Project complies with Goal 14.

4.15 Goal 15: Willamette River Greenway

The analysis of this Goal is based on the following documents: 1) *Supplemental Draft Environmental Impact Statement* (SDEIS), especially chapters 3.7 Visual and Aesthetic Qualities, 3.10 Parklands and Recreation Areas, 3.11 Ecosystems, 3.12 Water Quality and Hydrology, 2) *Water Quality and Hydrology Results Report*, 3) *Visual Quality and Aesthetics Results Report* and 4) *South Corridor Project Locally Preferred Alternative Report*, Metro, April 17, 2003 and the Willamette Greenway Plan adopted by the Portland City Council.

The Land Conservation and Development Commission adopted the Oregon Department of Transportation Willamette River Greenway Plan segments including the cities of: Milwaukie; Gladstone; Lake Oswego; Oregon City; West Linn; Wilsonville; Portland; and the counties of Multnomah and Clackamas. The bulk of the South Corridor does not include lands within these jurisdictions. However, the crossing of the Willamette River at Caruthers, as included in the Milwaukie LRT, is within the bounds of the City of Portland's Willamette River Greenway Plan, including its land use regulations and design guidelines. As design concepts, preliminary engineering and further details are developed for this crossing and the attendant lands on both sides of the river, consistency with City regulations will be achieved and this Goal will be addressed prior to final EIS and project approval.

Goal 15 Conclusion This Goal will be addressed when further design details are completed and the project completes coordination with the City of Portland concerning the crossing of the Willamette River.

4.16 Goals 16 through 19 These goals (16: Estuarine Resources, 17: Coastal Shorelands, 18: Beaches and Dunes and 19: Ocean Resources) are not applicable to this amendment as none of the region, including the subject project area, has these resources or features.

5 Regional Framework Plan

The Regional Framework Plan (RFP), including the Appendix, was adopted by the Metro Council in December, 1997 and contains the region's overall land use and transportation policies for the future. The RFP has been acknowledged by the Land Conservation and Development Commission as meeting the State Planning Goals and is included in the decision record, including two amendments, Policy 1.15 Centers and Policy 1.16 Neighborhoods added by Ordinance 02-969B in December, 2002. The RFP includes the 2040 Growth Concept, a description of the desired future outcome, regional policies, as well as a 2040 Growth Concept map.

- **Urban Form**

Regional policies include Policy 1.1 Urban Form, which calls for maintaining a compact urban form, preserving existing stable and distinct neighborhoods by focusing commercial and residential growth in mixed-use centers and targeting public investments to reinforce a compact urban form. The 2040 Growth Concept includes the Central City, Gateway and Clackamas regional centers, Milwaukie and Lents town centers as mixed-use centers. The 2040 Growth Concept map designates along I-205 from Gateway to Clackamas regional center a potential high capacity transit facility and shows an alignment from Downtown Portland to Milwaukie and from Milwaukie to Clackamas regional center as proposed light rail. Along these alignments mixed-use centers or station communities are shown that correspond to many of the transit stops shown on the South Corridor Project. The remaining transit stops will be addressed in a future

consideration of the RFP once additional information about station areas and potential mitigation measures are completed and made a part of the Final EIS.

Construction and operation of these facilities will provide substantial support for these mixed-use centers, providing alternative modes of travel to these areas and the jobs and housing that these centers are planned and zoned to be able to accommodate. This approach also provides support for housing types not found in inner and outer neighborhoods and encourages a more compact urban development pattern within these centers, protects existing neighborhoods by focusing growth in centers using public investments to reinforce the desired compact urban form. These facts and analysis provide support for the conclusion that the South Corridor Project is consistent with RFP policy 1.1, Urban Form.

- **Built Environment**

Another objective of the RFP is described in Policy 1.2, Built Environment. This policy calls for development in the region to occur in a coordinated and balanced fashion as evidenced by: the provision of affordable housing; provision of infrastructure and critical public services concurrent to support the 2040 Growth Concept; growth of regional economic opportunity, provision of an equitable distribution of jobs, income, investment and tax capacity throughout the region; coordination of public investment with local comprehensive and regional functional plans; and the creation of a balanced transportation system, less dependent on the private automobile, supported by both the use of emerging technology and the location of jobs, housing, commercial activity, parks and open space.

The South Corridor Project will provide a substantial public investment, high quality transit, that is consistent with local comprehensive plans as indicated by the resolutions of support from each affected city and county and which will encourage private investment in mixed-use development, including housing and jobs. As noted in sections 4.9 and 4.10 of this document, additional jobs and housing are expected to occur in the vicinity of transit stops on these LRT segments, especially in the centers. The construction and operation of these LRT segments will also improve transit service in the area in part because of increases in the frequency of service as well as the actual and perceived quality of the public transit vehicles. This will encourage more transit use, as noted in section 4.12 of this document and reduce dependence on the private automobile. Accordingly, the South Corridor Project is consistent with this RFP policy.

- **Economic Opportunity**

Economic opportunity is another regional concern addressed in the RFP with policy 1.4. This policy directs Metro to support public policy that maintains a strong economic climate through encouraging the development of a diverse and sufficient supply of jobs, especially family wage jobs, in appropriate locations throughout the region. The values, needs, choices and desires of consumers should also be taken into account. The values, needs and desires of consumers include: low costs for goods and services; convenience, including nearby and easily accessible stores; quick, safe, and readily available transportation to all modes; a wide and deep selection of goods and services; quality

service; safety and security and comfort, enjoyment and entertainment. The number and wage level of jobs within each subregion should be balanced with housing cost and availability within that subregion. The South Corridor Project is designed to serve five mixed-use centers as described earlier. According to *Performance Measures* (Metro, 2003) over half of existing jobs are currently located in centers, with 16 percent of all jobs in the Portland Central City, regional centers having 7 percent and town centers 6 percent. In the future, the amount of jobs within these centers is estimated (RFP pages 17 and 18), to remain the same (Central City) or increase (regional and town centers). Most of these center's jobs are commercial retail based and must respond to the needs and desires of consumers. Clackamas County does not have as many jobs per capita as much of the rest of the region and the South Corridor project will provide construction jobs as noted in the SDEIS although there are not a great many permanent jobs estimated to be likely to be directly attributable to the South Corridor Project, though it will indirectly support more jobs in centers.

- **Economic Vitality**

Economic vitality is another RFP policy (1.5). The policy states that the region's economic development must include all parts of the region, including areas and neighborhoods which have been experiencing increasing poverty and social needs. To allow the kinds of social and economic decay in older suburbs and the central city that has occurred in other larger and older metro regions is a threat to our quality of life and the health of the regional economy. All neighborhoods and all people should have access to opportunity and share the benefits, as well as the burdens, of economic and population growth in the region. In cooperation with local governments and community residents, Metro shall promote revitalization of existing city and neighborhood centers that have experienced disinvestment and/or are currently underutilized and/or populated by a disproportionately high percentage of people living at or below 80% of the region's median income. The South Corridor Project includes service to the Clackamas regional center and the Lents Town Center.

Clackamas County has identified the Clackamas regional center as a vital concern and in need of assistance. Accordingly, the County; formed the Clackamas Town Center Urban Renewal Area in 1980. This urban renewal district encompasses approximately 913 acres of land in the northwest part of unincorporated Clackamas County, between the cities of Milwaukie and Happy Valley. It was formed to provide transportation and community facilities in an area that was expected to grow rapidly. In the last twenty years many high quality office, retail, and multifamily projects have been built. As a result, the area's assessed value has increased from \$45 million in 1980 to \$438 million in 2002. In addition to the incremental assessed value growth, \$90 million of incremental assessed value was returned to the general tax rolls in 1987.

The Clackamas Town Center area is one of the region's fastest growing centers. Long term success depends on achieving a balance of access and amenities that attract residents, businesses, and future development. According to Clackamas County, "The biggest district challenges have been funding transportation projects, and providing enough parks, open space and public places."

In addition, the Lents town center is one for which the City of Portland has taken many actions to address. In September 1998, the City Council established a Lents Town Center Urban Renewal Area and implementation of the plan begin in fiscal year 1999-2000. Several planning projects are being undertaken to further identify specific projects and layout implementation strategies:

- Lents Town Center Business District Transportation Management Plan
- Lents Town Center Business District Redevelopment Implementation Strategy
- Neighborhood Street Paving Program
- Economic Development Strategy
- I-205 Corridor Strategy
- Housing Strategy
- Springwater Corridor Area Redevelopment Strategy
- Parks and Recreation Capital Improvements Strategy
- Budgeted expenditures over the next five years reflect an emphasis on commercial revitalization efforts and growing investments in neighborhood and residential infrastructure projects.

Project Areas:

- Home Ownership/ Rehabilitation Programs
- Business District Streetscape Redevelopment Projects
- Neighborhood Street Improvements
- Economic Development and Jobs Strategy
- Business and Job Development
- Parks Improvements
- Residential Streetpaving
- Neighborhood Traffic Safety
- Storefront Improvement Program

The South Corridor partners have coordinated its planning to ensure that these economic vitality efforts are supported. The public investments in the South Corridor Project will be substantial boosts for these ongoing economic efforts and demonstrate how the South Corridor Project is consistent with this RFP policy.

- **Growth Management and Developed Urban Land**

Another two related important RFP policies are growth management (RFP policy 1.6) and developed urban land (RFP policy 1.8). The growth management policy directs that Metro manage the urban land supply in a manner that encourages the evolution of an efficient urban growth form; provides a clear distinction between urban and rural lands; supports interconnected but distinct communities in the urban region; recognizes the inter-relationship between development of vacant land and redevelopment objectives in all parts of the urban region and is consistent with the 2040 Growth Concept and helps attain the region's objectives. Policy 1.8, Developed Urban Land, directs Metro to identify and address opportunities for and obstacles to the continued development and redevelopment of existing urban land. A combination of regulations and incentives shall be employed to ensure that the prospect of living, working and doing business in those locations remains attractive to a wide range of households and employers. In coordination

with affected agencies, Metro should encourage the redevelopment and reuse of lands used in the past or already used for commercial or industrial purposes wherever economically viable and environmentally sound.

The South Corridor Project does not include lands near the urban growth boundary. However, it does include five mixed-use centers, town center or larger that help provide for an efficient urban growth form. Redevelopment of the lands within these centers has already occurred and more is expected in the future given some of the economic vitality measures cited above and general regulations concerning all centers and mixed use areas in the region. Accordingly, the South Corridor Project is consistent with RFP policy 1.6, Growth Management and RFP Policy 1.8 Developed Urban Land.

- **Urban Design**

The RFP also includes Policy 1.10: Urban Design. This policy has many policy directives similar to the TPR. It directs Metro to support the identity and functioning of communities in the region through: the recognition and protection of critical open space features in the region; public policies that encourage diversity and excellence in the design and development of settlement patterns, landscapes and structures. It further states that the region should ensure that incentives and regulations guiding the development and redevelopment of the urban area promote a settlement pattern that: links any public incentives to a commensurate public benefit received or expected and evidence of private needs; is pedestrian “friendly,” encourages transit use and reduces auto dependence; provides access to neighborhood and community parks, trails and walkways, and other recreation and cultural areas and public facilities; reinforces nodal, mixed-use, neighborhood-oriented design; includes concentrated, high-density, mixed-use urban centers developed in relation to the region’s transit system; is responsive to needs for privacy, community, sense of place and personal safety in an urban setting and □ facilitates the development and preservation of affordable mixed-income neighborhoods. Pedestrian- and transit-supportive building patterns will be encouraged in order to minimize the need for auto trips and to create a development pattern conducive to face-to-face community interaction.

The South Corridor Project partners have shown keen interest in the identity and functioning of the area communities. The public investment to be made in this project's segments can serve as a stimulus to design excellence and will further support diversity in the settlement patterns, landscapes and structures within the mixed-use centers it will serve. The SDEIS, particularly the *Local Traffic Impacts Results Report*, provides detailed inventories of existing pedestrian conditions and measures that could be taken to improve the pedestrian setting and improve access to planned LRT service. Further the Community Impacts, Visual Impacts of the SDEIS and the inventories of historic and cultural resources, and potential mitigation measures all are intended to address privacy, community and sense of place considerations. Personal safety is included in Chapter 3.14, Safety and Security of the SDEIS as well as the section 3.13 that includes consideration of seismic conditions and potential mitigating measures. As noted in section 3.12 of this document, the South Corridor Project helps minimize the need for

auto trips, by providing a viable option to the auto for many trips. Accordingly, the South Corridor Project is found to be consistent with RFP policy 1.10, Urban Design.

- **Centers**

This policy directs Metro to develop a regional strategy for enhancement of centers, placing a high priority on investments by Metro and efforts by Metro to secure complementary investments by others. The strategy for each center is to be tailored to the needs of the center and shall include an appropriate mix of investments, incentives, removal of barriers and guidelines aimed to encourage the kinds of development that will add vitality to centers and improve their functions as hearts of their communities.

The South Corridor Project, as noted elsewhere in this document, serves five mixed use centers. The alternatives selected in the Locally Preferred Alternative for the South Corridor will provide a whole range of incentives as described in section 4.2 of this document. The South Corridor project will also reinforce the urban renewal efforts cited in the previous section of this document. Accordingly, the South Corridor Project is consistent with RFP policy 1.15 Centers.

- **Neighborhoods**

RFP Policy 1.16, Neighborhoods, is a policy included in the RFP as a result of Measure 26-29. It states that the livability of existing residential neighborhoods is essential to the success of the 2040 Growth Concept. It directs Metro to protect residential neighborhoods from air and water pollution, noise and crime, to make community services accessible to residents of neighborhoods by walking, bicycle and transit, where possible, to facilitate the provision of affordable government utilities and services to residential neighborhoods and to not require local governments to increase the density of existing single family neighborhoods identified solely as Inner or Outer Neighborhoods.

The South Corridor Project will provide a means of accommodating higher density development within proximity of transit stops, so that higher density housing and employment options can be provided in well-defined areas, not throughout the landscape and existing single family neighborhoods can remain as they are. Many of these transit stops already have a mixed use designation and no further comprehensive plan or zoning change is needed to ensure land use and transportation consistency. The immediate area around some transit stops is still under discussion for land use changes and the best boundaries for such land use changes to ensure compatibility with light rail transit and neighborhood concerns. These possible comprehensive plan and zone amendments will be considered at a later date and will include further consideration of this policy.

The South Corridor Project, as noted elsewhere in this document will result in better air quality than the No-Build alternative. The water quality aspects of the South Corridor Project have been inventoried and potential mitigation measures will be identified if adverse impacts can't be avoided. The SDEIS identifies possible noise impacts and potential mitigation measures will be identified for consideration in the final EIS. Safety and security issues have also been identified and potential mitigation measures are included in the SDEIS. The South Corridor Project will also substantially improve transit

service within the corridor. As each aspect of policy 1.16 Neighborhoods, has been addressed in referenced documents or a process identified for future resolution, the South Corridor Project is concluded to be consistent with this policy.

RFP Conclusion The relevant policies of the RFP have been identified, facts gathered concerning each policy and an analysis completed as described above. Based on the facts in evidence and the analyses, it is concluded that the South Corridor Project is consistent with the Metro Regional Framework Plan.

6 Regional Transportation Plan

The 2000 Regional Transportation Plan (RTP), including the Appendix, was adopted by Ordinance No. 00-869A and Resolution No. 00-2968B in August, 2000. It is included in the documents in the record for Ordinance 03-1007. The RTP is a plan that implements the transportation elements of the Regional Framework Plan, especially the 2040 Growth Concept. It has a multi-modal approach, integrating land use and transportation objectives. The plan recognizes that the automobile will likely continue to be the primary mode of personal travel over the life of the plan, while understanding the need for transportation alternatives for traveling to everyday destinations and to provide mobility for those unable to travel by automobile. It states that "Even the occasional use of transit, walking, bicycling or sharing a ride can help the region maintain its clean air, conserve energy and efficiently accommodate more people within a compact urban form."

Several RTP policies are addressed directly in other portions of this findings document as follows. Policy 1.0: Public Involvement of the RTP is addressed in section 4.1 of this document. Policy 2.0: Intergovernmental Coordination is addressed by sections 4.1 and 4.2 of this document. Policy 3.0: Urban Form, is addressed in the previous section of this document dealing with the Urban Form/RFP discussion.

- **Land Use and Transportation Planning Consistency**

RTP Policy 4.0 concerns consistency between land-use and transportation planning. The 2040 Growth Concept of the Regional Framework Plan was conceived as a means of coordinating land use and transportation. The Concept was developed after consideration of 4 alternatives that included differing land use and transportation changes assumed to occur by the year 2040. Estimates of transportation trips, congestion, air quality, acres of land consumed and many other land use and transportation measures were made. The 2040 Growth Concept was the resulting land use and transportation approach after technical and public comments were considered. The 2000 RTP was designed to implement the 2040 Growth Concept and shows light rail or high capacity transit along alignments generally consistent with the South Corridor Project with a few exceptions. The major exception is the Milwaukie to Clackamas regional center, which on the 2040 Growth Concept map is shown as proposed light rail. This segment is proposed to be deleted based on assessment of the I-205 and Milwaukie LRT segments which would be able to provide sufficient transit service that the Milwaukie to Clackamas LRT would not be needed. The 2040 Growth Concept also envisioned light rail as a vital connector between mixed use centers. The RFP states that "... regional centers would become the

focus of compact development, redevelopment and high quality transit service, multi-modal street networks and act as major nodes along regional through routes." Further, the RFP states: "Transit improvements would include light-rail connecting all regional centers to the central city." The South Corridor project includes transit service connecting five centers, Portland Central City, Gateway and Clackamas regional centers and Milwaukie and Lents town centers - half of the total centers in the corridor. Further, from a process standpoint, substantial coordination of land use and transportation planning have been achieved for the South Corridor Project. The Project was reviewed by TPAC and MTAC at the technical level for transportation and land use issues, respectively and by JPACT and MPAC for policy issues. Each have recommended approval of the South Corridor Project. While comprised of primarily local staffs or elected officials, these committees also included representatives from state and federal transportation agencies and from the state land use agency.

Given the above facts concerning the RFP and the South Corridor Project, both plan details as well as the review process followed, it is concluded that the South Corridor Project is consistent with this 2000 RTP policy concerning land use and transportation planning coordination.

- **Barrier-Free Transportation and Special Needs Transportation**

This 2000 RTP Policy 5.0, Barrier-Free Transportation, calls for access to more and better transportation choices for travel throughout the region and to serve the special access needs for all people, including youth, elderly and disabled. 2000 RTP Policy 5.1 Interim Special Needs Transportation policy that directs the region to serve the transit and transportation needs of the elderly and disabled in the region.

The South Corridor Project would rely on the barrier-free technology that TriMet has pioneered, including low-floor light rail cars that allow for direct access to cars without an elevation change. This is particularly helpful to the disabled, those that may use a wheelchair or other personal mobility device, the elderly or very young who may have challenges with steps. Accordingly, the South Corridor Project is consistent with this 2000 RTP policy.

- **Job Access and Reverse Commute**

The 2000 RTP Policy 5.2: Interim Job Access and Reverse Commute Policy directs the region to serve the transit and transportation needs of the economically disadvantaged in the region by connecting low-income populations with employment areas and related social services.

The South Corridor Project will provide high quality transit to the Portland Central City which currently provides about 16 percent of all jobs in the region as well as to other regional centers and town centers in the corridor as well as outside of the corridor (including, for example, portions the Columbia South Shore like the Portland International Airport and environs). The Lents area is one area of the region that has been identified as being a low income area in need of assistance and in addition to the economic development projects slated for the urban renewal district in the Lents town

center that is served by the South Corridor Project, LRT would provide access to other portions of the region where additional jobs are located.

Given that the South Corridor Project would connect the Lents and outer southeast Portland area which have substantial populations of lower income households with the Central City and other employment areas, it is concluded that the South Corridor Project is consistent with the 2000 RTP policy concerning job access and reverse commute policy.

- **Transportation Safety and Education**

2000 RTP Policy 6.0: Transportation Safety and Education is intended to improve the safety of the transportation system and to encourage bicyclists, motorists and pedestrians to share the road safely. The South Corridor Project has inventoried road intersections for motor vehicle, bicycle and pedestrian movement. Potential mitigation measures were identified in the SDEIS for each of these movements. To the extent that these mitigation measures are implemented, improved safety will result. Accordingly, the South Corridor Project is consistent with this RTP policy.

The 2000 RTP Policy 7.0, The Natural Environment, is addressed in sections 4.5, 4.6, 4.15 of this document. 2000 RTP Policy 8.0, Water Quality, is addressed in section 4.6 of this document, 2000 RTP Policy 9.0, Clean Air, is addressed in section 4.6 of this document and 2000 RTP Policy 10.0, Energy Efficiency, is addressed in section 4.13 of this document.

- **Regional Public Transportation System**

2000 RTP Policy 14.0: Regional Public Transportation System directs the region to provide an appropriate level, quality and range of public transportation option to serve this region and support implementation of the 2040 Growth Concept. This is addressed in the 2000 RTP policy concerning Land Use and Transportation Consistency as well as in section 4.12 of this document concerning the State's Transportation Planning Rule.

- **Public Transportation Safety and Environmental Impacts**

This 2000 RTP policy concerning public transportation safety and environmental impacts directs the region to continue efforts to make public transportation an environmentally-friendly and safe form of motorized transportation. This policy requires a system-wide approach to ensure compliance and obtain lower costs. The South Corridor Project will rely on the ongoing efforts of TriMet to continue with safety and environmentally-friendly construction operation and maintenance.

- **Regional Public Transportation Performance**

The 2000 RTP (Policy 14.3) calls for the region to provide transit service that is fast, reliable and has competitive travel times compared to the automobile. This is a goal that applies to all existing and planned transit in the region and as such, is dealt with region-wide. For the South Corridor, this policy has been considered in the Locally Preferred Alternative decision. Specifically, the I-205 LRT would save transit travel time, decreasing the transit travel time between the Rose Quarter Transit Center and the

Clackamas regional center compared to the no-build alternative, in addition, by having a dedicated right of way, transit reliability will be high as transit vehicles will operate independent of street or highway congestion conditions. The downtown Portland LRT would provide greater capacity and reliability by adding a second alignment in downtown Portland in addition to the Cross Mall. The Milwaukie LRT would provide the fastest travel time of any of the alternatives between Milwaukie and downtown Portland and it too, by using an exclusive right of way, would provide high reliability. Accordingly, the South Corridor Project provides fast, reliable service and meets policy 14.3, regional public transportation performance.

- **Regional Bicycle System Connectivity Bicycle System Mode Share and Accessibility**

These two policies (2000 RTP policies 16.0 and 16.1) call for the region to provide a continuous regional network of safe and convenient bikeways connected to other transportation modes and local bikeway systems, consistent with regional street design guidelines. Further, they direct the region to increase the bicycle mode share throughout the region and improve bicycle access to the region's public transportation system.

The region's light rail cars (as well as bus system) provides spaces designed to accommodate bicycles. The South Corridor Project will follow this approach and provide for bicycles. In addition, the *Local Traffic Impacts and Results Report* analyzes bicycle access to transit stations and identifies potential mitigation measures where adverse impacts are identified. These potential mitigation measures will be considered with the final EIS. Accordingly, the South Corridor Project has taken measures to increase accessibility and safety which in turn are likely to increase the bicycle mode share and the South Corridor Project is consistent with these two 2000 RTP policies.

- **Regional Pedestrian System, Mode Share, Access and Connectivity**

Three 2000 RTP policies concern pedestrian conditions. These are policy 17.0, Regional Pedestrian System, policy 17.1, Pedestrian Mode Share and policy 17.2, Regional Pedestrian Access and Connectivity. These policies call for the region to design the pedestrian environment to be safe, direct, convenient, attractive and accessible for all users. They call for an increase in walking for short trips and improving pedestrian access to the region's public transportation system through pedestrian improvements and changes in land-use patterns, designs and densities. Further, they call for providing direct pedestrian access, appropriate to existing and planned land uses, street design classification and public transportation, as a part of all transportation projects.

The South Corridor Project, recognizing the great importance of the pedestrian environment in proximity to transit stops for transit ridership, investigated existing pedestrian conditions and identified potential project related mitigation measures for each transit alternative. These are documented in the *Local Traffic Impacts Results Report* and summarized in the SDEIS (section 4.1.5). The final EIS and project approval will consider these potential mitigating measures. All potential pedestrian improvements identified may not be made, but likely most of them will, given how walking to and from a transit stop is critical to many, if not most of the transit trips (some transit stops have

park and ride facilities and therefore, on one leg of a trip, pedestrian conditions beyond the park and ride may not be of importance to some riders).

The South Corridor Project, having examined current pedestrian conditions and identified potential mitigation measures that would improve the pedestrian environment in proximity to the transit station, is concluded to be consistent with policies 17.0, 17.1 and 17.2 concerning pedestrian conditions.

- **Transportation System Management**

The 2000 RTP (see Policy 18.0) calls for the use of transportation system management techniques to optimize performance of the region's transportation systems. It states that mobility is to be emphasized on corridor segments between 2040 Growth Concept primary land-use components. The policy includes emphasizing access and livability within such designations and selection of appropriate transportation system techniques according to the functional classification of corridor segments.

The I-205 LRT will connect the Gateway and Clackamas regional centers (and to the existing LRT line to the Central City (downtown Portland), and the Gresham, Beaverton and Hillsboro regional centers). The Milwaukie LRT would connect the Milwaukie town center with the Central City. These LRT connections would be in addition to existing Federal highway connections (I-205 and Highway 99E). Regional centers (see table 1.1, page 1.2 of the 2000 RTP) are among the primary land-use components noted in the hierarchy of 2040 design types. As noted earlier the Regional Framework Plan's 2040 Growth Concept states that "Transit improvements would include light-rail connecting all regional centers to the central city." The South Corridor Project also includes pedestrian and bicycle potential mitigation measures that could improve pedestrian and bicycle trips as well as transit trips, reducing congestion on the road system over the no-build alternative.

Accordingly, the South Corridor Project would increase mobility (by adding light rail to the existing highway connections) between 2040 Growth Concept primary land-use components (Gateway and Clackamas regional centers and to the Central City from the Milwaukie Town Center) using appropriate transportation system techniques (light rail, connecting regional centers to the central city along with pedestrian and bicycle improvements in proximity to transit stops). Therefore, it is concluded that the South Corridor Project is consistent with 2000 RTP policy 18.0, Transportation System Management.

- **Regional Transportation Demand Management**

This 2000 RTP policy (Policy 19.0), calls for the region to enhance mobility and support the use of alternative transportation modes by improving regional accessibility to public transportation, carpooling, telecommuting, bicycling and walking options.

As noted in the previous section, the South Corridor Project will increase mobility by adding light rail transit as an alternative to auto trips in this corridor. It will also include pedestrian and bicycle improvements. Though not directly included in the South

Corridor Project, the Clackamas regional center area has a transportation demand association. The Clackamas Regional Center Transportation Management Association (CRC-TMA) was formed by business leaders in the Clackamas regional center area, who developed a list of ranked, possible solutions. The CRC-TMA is an employer based program to increase transportation opportunities within the TMA area. Some of the services that could be included are carpooling, shuttle bus and transit. The CRC-TMA meets regularly on the 4th Tuesday of each month at 7:45AM in the conference room of the North Clackamas County Chamber of Commerce. The CRC-TMA employs one full time staff member with the Chamber of Commerce providing additional clerical and administrative assistance as needed. The South Corridor Project is complementary to the CRC-TMA, providing another tool for the TMA to management transportation demand.

Accordingly, the South Corridor Project is concluded to be consistent with policy 19.0, Regional Transportation Demand.

- **Regional Parking Management**

The 2000 RTP calls for the region to manage and optimize the efficient use of public and commercial parking in the central city, regional centers, town centers, main streets and employment centers to support the 2040 Growth Concept and related RTP policies and objectives.

As noted earlier, the Metro Council adopted the Urban Growth Management Functional Plan which has requirements for the cities and counties within the region to manage and optimize the efficient use of public and commercial parking. Further, the Metro Council adopted Resolution No. 03-3299, entering an order relating to compliance with the reduced parking requirements. Construction of the South Corridor Project would have to include conformance with this regional policy that is implemented locally. The South Corridor SDEIS, section 4.16, pages 4-10 and 4-11, also summarize the parking conditions within the corridor. Potential mitigation for parking removal is also documented in the SDEIS for each segment (see pages 4-37 & 38 B. Park-and-Ride Lot-Related Traffic Impacts and Potential Mitigation, pages 4-39 & 4-40, 4-49, 4-53 and 4-57, C. Parking Impacts and Potential Mitigation) The Locally Preferred Alternative identifies several park-and-ride facilities where more information and coordination with local neighborhoods and governments must be done before final designs are completed. These will be done prior to the final EIS and project approval.

Accordingly, the South Corridor Project has shown substantial consideration of parking within the corridor, is subject to parking management requirements and has included further analysis and consideration of other parking prior to the final EIS and therefore it is concluded that the South Corridor Project is consistent with 2000 RTP policy 19.1 regional parking management.

- **Transportation Funding**

Policy 20.0 of the 2000 RTP calls for the region to ensure that the allocation of fiscal resources is driven by both land use and transportation benefits. The South Corridor Project will provide light rail service to the Clackamas regional center via the Gateway

regional center. The Portland Transit Mall LRT will provide higher quality service to the Central City while the Milwaukie LRT will connect downtown Portland with the Milwaukie town center. In doing so, these centers receive a transportation investment that will bolster center development, a land use goal of the region. In turn growth in these centers will help the region manage the urban growth boundary and maintain a compact urban form, another regional goal. Transportation benefits emanating from the South Corridor Project include an alternative method of transportation and congestion reduction, when compared with the no-build alternative.

Accordingly, it is concluded that the South Corridor project includes consideration of both land use benefits as well as transportation benefits.

For 2000 RTP Policy 20.1, 2040 Growth Concept Implementation, see the discussion of RTP Policy 4.0, above.

- **Transportation System Maintenance and Preservation**

The 2000 RTP (Policy 20.2) calls for the region to emphasize the maintenance, preservation and effective use of transportation infrastructure in the selection of the RTP projects and programs.

While the South Corridor Project has not yet been built and maintenance or preservation of it is therefore not possible, it is possible to consider how the South Corridor Project has considered use of the existing transportation infrastructure. The South Corridor Project includes three segments. The I-205 LRT segment uses existing right of way along the I-205 freeway from Gateway to Clackamas regional center. This approach will mean a more cost effective light rail alignment than if a whole new right of way alignment were to be acquired. Similarly, the downtown Portland Transit Mall LRT will make use of existing right of way and augment some bus service as well as replace other bus service with light rail service in this segment. Finally, the Milwaukie LRT makes use of existing railroad right of ways in the alignments paralleling McLoughlin Boulevard and from the Harrison Street station to the Lake Road station. All of these segments, I-205, Portland downtown and Milwaukie, use existing rights of ways while allowing continued use of current non LRT modes on remaining rights of ways.

Accordingly, the South Corridor Project is concluded to be consistent with 2000 RTP policy 20.2, Transportation System Maintenance and Preservation.

In addition to the 2000 RTP policies addressed above, Chapter 6, Implementation, includes a section that concerns amending the RTP. Section 6.6.1 states that:

"When Metro amends policies or system maps in Chapter 1 of this plan or compliance criteria in this chapter, it will evaluate and adopt findings regarding consistency with the Regional Framework Plan. Decisions on amendments made at this level are land-use decisions for need, mode, corridor, general scope and function of a proposed project. Subsequent land-use decisions on final project design and impact mitigation will be needed prior to construction. Such analysis could lead to a 'no-build' decision where a proposed project is not recommended for

implementation, and would require reconsideration of the proposed project or system

improvements. As such, amendments at this level shall be reviewed through the post-acknowledgement process. However, a decision on an amendment to the Regional Transportation Plan should not foreclose or appear to foreclose full and fair consideration of all relevant goal issues at such time that specific projects and programs are adopted by a local jurisdiction.

It is Metro's responsibility to adopt findings based on project need, mode, corridor, general scope and function of projects proposed in the Regional Transportation Plan."

Section 5 of this document provides findings for consistency with the Regional Framework Plan. These findings, along with the reasons for selection contained within the Locally Preferred Alternative, (April 17, 2003) provide land use and justification for the need, mode, corridor, general scope and function of the South Corridor Project. It is also noted that a no-build alternative was considered as noted in both the SDEIS as well as the Locally Preferred Alternative and was not selected. This proposed RTP amendment was initiated by a 45 day notice to the Department of Land Conservation and Development in order to ensure compliance with the Department's requirements for plan amendments. Finally, section 6 of these findings provides findings of consistency with the 2000 RTP. Accordingly, it is concluded that the South Corridor Project has complied with this section of the 2000 RTP.

Section 6.6.2 of the 2000 RTP speaks more specifically to RTP project amendments. This section requires that amendments resulting from major studies must be recommended by a resolution of JPACT and the Metro Council and that the amendments must be incorporated into the RTP through a quasi-judicial or legislative process. The South Corridor Project Locally Preferred Alternative was recommended by JPACT through Metro Resolution 03-3303, which was adopted by the Metro Council on April 17, 2003. The 2000 RTP was then proposed for amendment to include the South Corridor Project in Ordinance No. 03-1007. Accordingly, the South Corridor Project complies with section 6.6.2 of the 2000 RTP.

RTP Conclusion All relevant regional policies included in the 2000 RTP have been examined in these findings concerning the South Corridor Project. After consideration of all regional policies and the South Corridor Project, as documented above, it is concluded that the South Corridor Project is consistent with the 2000 Regional Transportation Plan.

7 Federal Standards and Requirements

The SDEIS and its accompanying results reports as well as the public outreach materials and the Locally Preferred Alternative were all prepared, in part, to address federal requirements. The SDEIS was submitted jointly by, among others, the U.S. Department of Transportation, Federal Transit Administration and Federal Highway Administration in cooperation with the U.S. Army Corps of Engineers. A final EIS and federal project approval will be considered in the future and will be prepared consistent with all Federal standards and regulations.

Federal Consistency Conclusion Accordingly, the South Corridor Project is concluded to be consistent with Federal regulations, including 42 U.S.C 4322)2)(c), the National Environmental Policy Act.

Overall Conclusion The above findings address the State Planning Goals, the Oregon Transportation Plan and its goals, the Metro Regional Framework Plan and the Metro 2000 Regional Transportation Plan and Federal policies. The South Corridor Project was also coordinated with all affected local jurisdictions and resolutions of support for the Locally Preferred Alternative have been received. Accordingly, it is concluded that the South Corridor Project is consistent with all federal, state, regional and local policies.

STAFF REPORT

IN CONSIDERATION OF ORDINANCE NO. 03-1007, FOR THE PURPOSE OF AMENDING THE REGIONAL TRANSPORTATION PLAN TO INCLUDE THE TWO PHASES OF THE SOUTH CORRIDOR STUDY CONSISTING OF THE I-205 LIGHT RAIL TRANSIT PROJECT FROM GATEWAY TO CLACKAMAS REGIONAL CENTER WITH PORTLAND TRANSIT MALL LRT, EXPANSION OF LIGHT RAIL FROM DOWNTOWN PORTLAND TO MILWAUKIE AND DELETION OF PLANS TO EXTEND LIGHT RAIL FROM MILWAUKIE TO CLACKAMAS REGIONAL CENTER

Date: April 30, 2003

Prepared by: Mark Turpel
Sharon Kelly
Ross Roberts

BACKGROUND

On April 17, 2003, the Metro Council adopted resolution 03-3303, approving an amendment to the South/North Corridor project Locally Preferred Strategy to include a two phased approach, as follows:

- Phase 1 as the I-205 Light Rail Project (LRT), extending LRT from Gateway regional center to Clackamas regional center and including LRT on the Portland Transit Mall, as well as the following transit improvements in Milwaukie; 1) construction of a Southgate park-and-ride lot scheduled to begin construction in Fall 2003, 2) relocation of the existing on-street Milwaukie transit center to the Southgate area pending resolution of design and environmental issues, and 3) between Milwaukie and Oregon City, implement select Bus Rapid Transit and park-and-ride improvements pending evaluation in TriMet's *Transit Investment Plan* process.
- Phase 2 as the Milwaukie Light Rail Project, including extension of LRT from the Portland Transit Mall to Milwaukie, which will be advanced following completion of the I-205 Final Environmental Impact Statement, adoption of a finance plan for the project and the resolution of issues related to the Willamette River crossing.

Resolution 03-3303 also directed "...Metro staff to prepare an amendment to the Regional Transportation Plan (RTP) to include the I-205 LRT Project in conjunction with the LUFO amendment." Ordinance 03-1007 addresses the Regional Transportation Plan amendment along with changes related to the adoption of the two-phased Locally Preferred Strategy. In addition, it amends the current RTP to delete the designation of "proposed light rail" between Milwaukie town center and Clackamas regional center. When additional details concerning the best station area configurations and Portland Transit Mall design and connection south to the Phase 2 design to Milwaukie, a resolution for considering a Land Use Final Order (LUFO) will be prepared for Metro Council consideration.

The South Corridor LRT transportation changes also need to be considered for their regional land use plan implications. Currently, the Regional Framework Plan, which includes the 2040 Growth Concept Map, designates a corridor along I-205 between the Gateway Regional Center and the Clackamas Regional Center as a "Potential High Capacity Transit" facility. This same designation, "Potential High Capacity Transit" is also designated from downtown Portland to Milwaukie and from Milwaukie to Clackamas regional center. The Gateway to Clackamas segment and the downtown Portland to Milwaukie segment are consistent with the recently amended Locally Preferred Strategy. However, the map does not currently designate any station communities or other 2040 design types along I-205 from Gateway to Clackamas regional center that might be expected to be located at LRT stops. In the future

there will be a need to consider LRT stations and their land use implications along this segment between Gateway and Clackamas regional centers. In addition, the current 2040 Growth Concept Map includes an LRT designation from Milwaukie to Clackamas regional center. However, any 2040 Growth Concept Map change or RFP amendment is proposed to be postponed until additional information is prepared as part of the final environmental impact statement and preliminary engineering in order to better understand the specific nature of the proposed transportation improvements and more is known about the proposed station community boundaries. Metro is planning a Regional Framework Plan update soon, including possible 2040 Growth Concept Map amendments, and it is proposed to batch all draft changes together in order to better understand the overall land use affects of the various changes. Station community additions, deletion of the high capacity transit from Milwaukie to Clackamas regional center and other changes to the 2040 Growth Concept map and Regional Framework Plan would be considered at this time.

The specific nature of the proposed RTP amendments concern urban Clackamas and Multnomah counties and select cities within these counties, including Milwaukie and Portland. Currently, the 2000 RTP has a "Rapid Bus" designation along I-205 from Gateway Regional Center south to the Clackamas Regional Center and beyond. Approval of this ordinance would change this designation from Rapid Bus to Planned Light Rail and make other text related changes to ensure consistency with this change as specified in draft Ordinance No. 03-1007. In addition, RTP amendments showing LRT on the downtown Portland Transit Mall LRT, consistent with Phase 1 of the South Corridor project, are also proposed. Further, the LRT corridor designation from downtown Portland to Milwaukie would be changed from "proposed light rail" to "planned light rail". Finally, the planned light rail extension from Milwaukie town center to Clackamas regional center would be deleted.

While the proposed RTP amendments are significant, there is a very substantial base of information that has been produced and extensive public involvement that has occurred to consider various alternatives, including a no build alternative. The evaluation included assessment of the environmental impacts, benefits, costs, and financing associated with the proposed project alternatives. The bulk of this information can be found in the South Corridor Supplemental Draft Environmental Impact Statement (SDEIS), which was prepared in compliance with the National Environmental Policy Act (NEPA). Seven state and local jurisdictions participated with Metro in the preparation and review of the SDEIS, including the cities of Milwaukie, Oregon City and Portland as well as Clackamas and Multnomah counties and TriMet and ODOT. Each jurisdiction approved a resolution in support of this project. The SDEIS was completed consistent with Federal agencies including the Federal Transit Administration (FTA) and the Federal Highway Administration (FHWA) which were Federal co-lead agencies for the project, with the U.S. Army Corps of Engineers (Corps) acting as a cooperating federal agency. The South Corridor SDEIS supplements the South/North Corridor Project Draft Environmental Impact Statement that was published in February, 1998. A detailed description of the analyses and extensive public outreach may be found in the SDEIS and staff report prepared for Resolution 03-3303.

ANALYSIS/INFORMATION

1. Known Opposition

Over 300 public comments were received during the SDEIS public comment period between December 20, 2002 and February 7, 2003. These comments are compiled in the South Corridor Project Public Comment Report (Metro, February 2003). The comment report was made available to the public, the South Corridor Project Steering Committee, the local jurisdictions within the South Corridor and to the Metro Council.

Generally comments demonstrated a mix of support for I-205 Light Rail. Few comments were received in support of the Bus Rapid Transit or Busway alternatives. Those who opposed light rail preferred subway, increased Bus Rapid Transit or Highway solutions. Some concerns were raised about noise and vibration, safety and security, and traffic related impacts by the Lents community. Opposition to a bus transfer facility at the Waldorf School was received.

2. Legal Antecedents

There are a wide variety of Federal, State, Regional and Local regulations that apply to this project. The South Corridor Project Supplemental Draft Environmental Impact Statement (Metro, December 2002) addresses many of these regulations. The local jurisdictions will address their local land use regulations through the land use permitting process that will occur during the Final Design and Construction phases of the project.

Previous related Metro Council Resolutions include:

- In July 1998 the Metro Council adopted Resolution No. 98-2674 for the purpose of adopting the Locally Preferred Strategy for the South/North Light Rail Project.
- In July 1998 the Metro Council adopted Resolution No. 98-2673 for the purpose of adopting the Land Use Final Order establishing the light rail route, station, lots and maintenance facilities and the related highway improvements, including their locations, for the South/North Light Rail Project.
- In June 1999 the Metro Council adopted Resolution No. 99-2806A for the purpose of amending the Locally Preferred Strategy for the South/North Light Rail Project to define the Interstate MAX Project as the first construction segment and to amend the FY 2000 Unified Work Program.
- In June 1999 the Metro Council adopted Resolution No. 99-2795A for the purpose of amending the FY '00 Unified Work Program to add the South Corridor Transportation Alternatives Study and amending the Transportation Improvement Program (TIP) to authorize FY '99 Surface Transportation (STF) Funds.
- In October 1999 the Metro Council adopted Resolution No. 99-2853A for the purpose of adopting a Land Use Final Order amending the light rail route, light rail stations and park-and-ride lots, including their locations, for that portion of the South/North Project extending from the Steel Bridge to the Exposition Center.
- In March, 2003, the Metro Council adopted Resolution No. 03-3290, endorsing the Metropolitan Transportation Improvement Program for a Regional Funding Plan that included the I-205 LRT project between Gateway and Clackamas regional centers.
- In April, 2003, the Metro Council adopted Resolution No. 03-3303, amending the Locally Preferred Strategy for the South/North Corridor Project with the I-205 Light Rail Project as the Phase 1 Locally Preferred Alternative.

3. Anticipated Effects

Amendment of the 2000 RTP will provide for further assessment of the project by allowing for preparation of a final environmental impact statement and preliminary engineering. With Metro's adoption of the amendment to the Locally Preferred Strategy, local lead agency responsibility transfers from Metro to TriMet. TriMet will work with Metro, the Federal Transit Administration, the Federal Highway Administration and the local jurisdictions to complete Preliminary Engineering and the Final Environmental Impact Statement, complete the details of the finance plan, complete Final Design and initiate construction of the project. Metro staff will prepare an amendment to the SDEIS for light rail improvements related to the Mall Alignment 5th and 6th Avenues in downtown Portland. The project could initiate construction as early as 2005.

4. Budget Impacts

There are no direct budget impacts from this proposed change to the 2000 RTP. However, there are related budget impacts that include preparation of further analyses. Metro staff will continue to work with TriMet, FTA, FHWA and the local jurisdictions on the project through completion of the Final Environmental Impact Statement. Metro staff costs will continue to be funded through the project budget that has federal and local sources. Capital funding of the project will be through various local and federal sources and will be managed by TriMet.

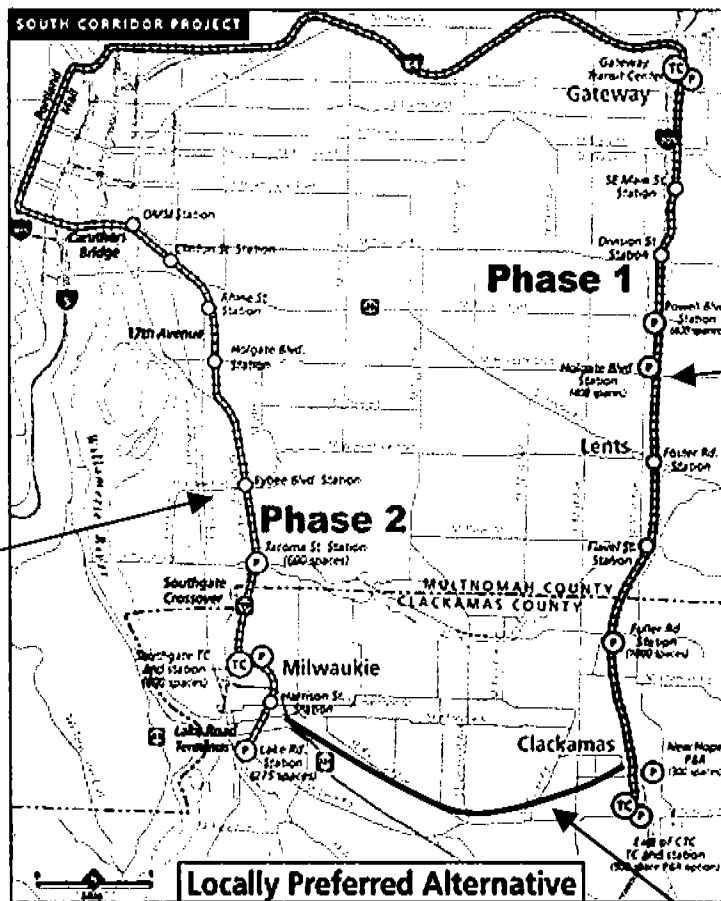
RECOMMENDED ACTION

Staff recommend that the Metro Council adopt Ordinance No. 03-1007 amending the 2000 Regional Transportation Plan to designate a corridor along I-205 from the Gateway Regional Center to the Clackamas Regional Center for Light Rail Transit, including a plan for LRT along the Portland Transit Mall, redesignation of proposed light rail to planned light rail for an alignment from downtown Portland to Milwaukie and deletion of a proposed light rail from Milwaukie to the Clackamas regional center.

Proposed Amendment of Metro Regional Transportation Plan April 30, 2003

In response to the April 17, 2003 Metro Council adoption of the Supplementary Draft Environmental Impact Statement for the South Corridor, the Metro Council is considering amendment of the Regional Transportation Plan. This amendment is comprised of two phases. Phase 1 includes a corridor along I-205 from Gateway regional center to the Clackamas regional center for Light Rail Transit as well as adding Light Rail along the Transit Mall in downtown Portland. Phase 2 is extension of light rail from the southern end of downtown Portland Transit Mall south to the Lake Road Terminus.

Proposed addition and realignment of Light Rail in downtown Portland Transit Mall, extension to Lincoln, and re-designation of "Proposed Light Rail" from Portland Central City to Lake Road Terminus south of Milwaukie



Proposed Change from "Rapid Bus" to "Planned Light Rail" for Segment along I-205 From Gateway to Clackamas Regional Center

Proposed Deletion of "Proposed Light Rail" from Milwaukie Town Center to Clackamas Regional Center

Exhibit A to Ordinance No. 03-1007A

Proposed South Corridor RTP Text Changes

Ordinance 03-1007 proposes amendment of the Regional Transportation Plan so that a general alignment for planned light rail transit is shown from Gateway to Clackamas Regional Center, including LRT improvements to the Portland Transit Mall as a first phase. The second phase includes extension of light rail transit from downtown Portland to Milwaukie. In addition, it includes deletion of proposed light rail between Milwaukie and Clackamas Regional Center. More specifically, it includes the following:

1. Chapter 5, page 5-8 , Subarea 2: Portland Central City and Neighborhoods, second paragraph, revise second sentence to state: "Transit service in this subarea is ~~mostly limited to~~ regional bus service and light rail, extending north to the Portland Metropolitan Exposition (Expo) Center, and south from Gateway to Clackamas Regional Center along I-205, including Portland Transit Mall LRT improvements and south from the Portland Transit Mall to the Milwaukie regional town center, ~~from the Rose Quarter transit center, and then~~ Extension of high capacity transit north potentially to Clark County, Washington may also be considered. "

2. Chapter 5, page 5-9, Subarea 3: East Multnomah County - revise to read: "Transit service in the East Multnomah County subarea included regional bus service and light rail. Extension of light rail transit from Gateway regional center to Clackamas regional center, including Portland Transit Mall LRT is included in the financially constrained system. Transit coverage in this subarea did not vary from the priority system, although both bus and light rail service are less frequent and there are fewer capital improvements to increase bus speed and reliability."

3. Chapter 5, page 5-10, Subarea 5: Urban Clackamas County - revise third sentence as follows: "Key improvements like adding capacity to I-205, Highway 224, the Sunrise Corridor ~~and high capacity transit to Clackamas and Oregon City regional centers~~ are not retained in the financially constrained system. ~~Transit service in this subarea include regional bus service and light rail, from the Rose Quarter transit center to the Milwaukie town center.~~ A Light rail extensions from Gateway to the Clackamas regional center along I-205, including Portland Transit Mall LRT and from Milwaukie to the Portland Transit Mall Oregon City and Clackamas regional centers is not are included in the financially constrained system."

4. Amend Chapter 5, pages 5-43, 5-51 and 5-61 under Light Rail Expansion to read: "Extend light rail service from the Rose Quarter transit center north to the Portland Metropolitan Exposition Center, ~~and south along I-205 from Gateway to Clackamas regional center,~~ including Portland Transit Mall improvements and south from the Portland Transit Mall to Milwaukie. ~~then p~~Potentially high capacity transit could be extended to Vancouver, Washington. Provide interim bus service along McLoughlin Boulevard and Highway 224 from Clackamas regional center to the Portland central city until light rail service can be provided in this corridor."

5. Specific Corridor Studies 6.7.6(page 6-36) Amend the McLoughlin-Highway 224 section to read "The recently completed South/North light rail Corridor study demonstrated the desirability and feasibility of both a long-term need for high-capacity transit service in this corridor, and a short-term opposition to construction of light rail. light rail service to Clackamas Regional Center along I-205 from Gateway regional center, including improvements along the Portland Transit Mall as a first phase and between Milwaukie town center and downtown Portland as a second phase. However, the long-term transit need is still critical, as demonstrated in the RTP analysis where both highway and high-capacity transit service were needed over the 20-year plan period to keep pace with expected growth in this part of the region. Therefore, the recommendations for this corridor study assume a short-term rapid bus, or equivalent, transit service in the corridor, and light rail service is retained in the long-term as a placeholder. Transportation solutions in this corridor should address the following design considerations...

- Provide improved transit access to Milwaukie town center and between Gateway and Clackamas regional center,s, including rapid bus in the short term, and light rail service from Clackamas regional center to Central City in the long term"

6. Amend the 2000 Regional Transportation Plan Appendix as shown below:

BEFORE THE METRO COUNCIL

FOR THE PURPOSE OF AMENDING THE REGIONAL)	
TRANSPORTATION PLAN TO INCLUDE THE TWO)	Ordinance No. 03-1007
PHASES OF THE SOUTH CORRIDOR STUDY)	
CONSISTING OF THE I-205 LIGHT RAIL TRANSIT)	
("LRT") PROJECT FROM GATEWAY TO CLACKAMAS)	Introduced by Councilor Newman
REGIONAL CENTER WITH PORTLAND TRANSIT)	
MALL LRT, EXPANSION OF LRT FROM DOWNTOWN)	
PORTLAND TO MILWAUKIE AND DELETION OF)	
PLANS TO EXTEND LRT FROM MILWAUKIE TO)	
CLACKAMAS REGIONAL CENTER)	

WHEREAS, extensive analysis was completed in the form of the South Corridor Supplemental Draft Environmental Impact Statement ("SDEIS"), published on December 20, 2002, which evaluated a no-build alternative, a Bus Rapid Transit Alternative, a Busway Alternative, a Milwaukie Light Rail Alternative, an I-205 Light Rail Alternative and a Combined Light Rail Alternative along with various design options; and

WHEREAS, the public was invited to comment on the SDEIS during the public comment period from December 20, 2002 through February 7, 2003, and comments received during the comment period, including at two public hearings, are documented in the South Corridor Project Public Comment Report (February 2003); and

WHEREAS, the South Corridor Policy Committee reviewed the SDEIS, considered the public comments and adopted a recommendation to amend the South/North LPS through a two-phased major transit investment strategy for the South Corridor, with the I-205 Light Rail Project as the Locally Preferred Alternative ("LPA") for Phase 1, including light rail transit on the Portland Transit Mall, and Phase 2, composed of extension of light rail transit (LRT) from downtown Portland to Milwaukie; and

WHEREAS, the local governments in the South Corridor have reviewed the Policy Committee's recommendations for a two-phased approach, including the I-205 LRT project, and the TriMet Board, ODOT, and the local governments each adopted a resolution supporting these recommendations; and

WHEREAS, Federal Transit Administration (“FTA”) regulations require that the Locally Preferred Alternative be included in the Financially Constrained Regional Transportation Plan (“RTP”) and the Metropolitan Transportation Improvement Plan (“MTIP”) in order to be advanced to preliminary engineering; and

WHEREAS, the Metro Council adopted Resolution No. 03-3290, endorsing a multi-year commitment of MTIP funds that includes the I-205 LRT project; and

WHEREAS, the existing 2000 RTP designates the segment along I-205 from Gateway to Clackamas Regional Center as Rapid Bus; and

WHEREAS, the Metro Council adopted Resolution No. 03-3303, amending the Locally Preferred Strategy to include the Phase 1 I-205 LRT Project from Gateway to Clackamas Regional Center, including LRT along the Portland Transit Mall, and a Phase 2 extending LRT from downtown Portland to Milwaukie as the Locally Preferred Alternative and directed staff to prepare an amendment to the 2000 Regional Transportation Plan to include the I-205 LRT project; now, therefore

THE METRO COUNCIL ORDAINS AS FOLLOWS:

1. The text of the 2000 Regional Transportation Plan (“RTP”) is amended as indicated in Exhibit A, attached and incorporated into this ordinance, to include the Locally Preferred Alternative, adopted by the Council in Resolution No. 03-3303, in the Financially Constrained RTP.
2. The following maps of the RTP are amended as described here and as indicated in Exhibit B, attached and incorporated into this ordinance, to include the Locally Preferred Alternative in the Financially Constrained RTP:
 - a. Amend Figure 1.16, Regional Public Transportation System map, to replace the “Rapid Bus” designation from Gateway to Clackamas Regional Center with a “Planned Light Rail” designation; to replace “Proposed Light Rail” to “Planned Light Rail” on the downtown Portland to Milwaukie corridor; to extend the

Planned Light Rail in the downtown Portland transit mall to Lincoln Street in the Central City inset; and to remove the “Proposed Light Rail” from Milwaukie to Clackamas Regional Center.

- b. Amend Figure 5.2, Regional Transit Service Strategy map, to replace the “Rapid Bus” designation from Gateway to Clackamas Regional Center with a “Light Rail Transit” designation; to delete the “Light Rail Transit” designation from Milwaukie to Clackamas Regional Center; and to extend “Light Rail Transit” to Lincoln Street along the downtown Portland Transit Mall on the Central City inset on the following page.
- c. Amend Figure 5.9, Portland Central City Transportation Projects map, to add project number 1001 as a financially constrained project; to show “Light Rail Transit” on the downtown transit mall on the Portland Central City inset; and to add a number 1001 as a financially constrained project.
- d. Amend Figure 5.10, East Multnomah County Transportation Projects map, to add project number 1001 as a transit improvement along I-205 from Gateway to Clackamas Regional Center and as a financially constrained project; and to revise the Gateway inset to include project number 1001 along I-205 from Gateway south.
- e. Amend Figure 5.12, Urban Clackamas County Transportation Projects map, to add project number 1001 as a transit improvement along I-205 from Gateway to Clackamas Regional Center and as a financially constrained project; to delete the blue transit line from Milwaukie to Clackamas Regional Center; to delete the blue transit line south of Clackamas Regional Center including project number 5129; to delete project number 1001 just east of Highway 224; and to add project number 1001 to I-205 transit north of Clackamas Regional Center to the Clackamas Regional Center inset.

3. The Council adopts the Findings of Fact and Conclusions of Law in Exhibit C to explain how these amendments comply with the policies of the Regional Framework Plan, the RTP, the statewide planning goals and other applicable legal requirements.

ADOPTED by the Metro Council this 19th day of June, 2003.

David Bragdon, Council President

ATTEST:

Approved as to Form:

Recording Secretary

Daniel B. Cooper, Metro Attorney

Exhibit A to Ordinance No. 03-1007

Proposed South Corridor RTP Text Changes

Ordinance 03-1007 proposes amendment of the Regional Transportation Plan so that a general alignment for planned light rail transit is shown from Gateway to Clackamas Regional Center, including LRT improvements to the Portland Transit Mall as a first phase. The second phase includes extension of light rail transit from downtown Portland to Milwaukie. In addition, it includes deletion of proposed light rail between Milwaukie and Clackamas Regional Center. More specifically, it includes the following:

1. Chapter 5, page 5-8 , Subarea 2: Portland Central City and Neighborhoods, second paragraph, revise second sentence to state: “Transit service in this subarea is mostly limited to regional bus service and light rail, extending north to the Portland Metropolitan Exposition (Expo) Center, and south from Gateway to Clackamas Regional Center along I-205, including Portland Transit Mall LRT improvements and south from the Portland Transit Mall to the Milwaukie regional town center, from the Rose Quarter transit center, and then Extension of high capacity transit north potentially to Clark County, Washington may also be considered.”
2. Chapter 5, page 5-9, Subarea 3: East Multnomah County - revise to read: “Transit service in the East Multnomah County subarea included regional bus service and light rail. Extension of light rail transit from Gateway regional center to Clackamas regional center, including Portland Transit Mall LRT is included in the financially constrained system. Transit coverage in this subarea did not vary from the priority system, although both bus and light rail service are less frequent and there are fewer capital improvements to increase bus speed and reliability.”
3. Chapter 5, page 5-10, Subarea 5: Urban Clackamas County - revise third sentence as follows: “Key improvements like adding capacity to I-205, Highway 224, the Sunrise Corridor and high capacity transit to Clackamas and Oregon City regional centers are not retained in the financially constrained system. Transit service in this subarea include regional bus service and light rail, from the Rose Quarter transit center to the Milwaukie town center. A Light rail extensions from Gateway to the Clackamas regional center along I-205, including Portland Transit Mall LRT and from Milwaukie to the Portland Transit Mall Oregon City and Clackamas regional centers is not are included in the financially constrained system.”
4. Amend Chapter 5, pages 5-43, 5-51 and 5-61 under Light Rail Expansion to read: “Extend light rail service from the Rose Quarter transit center north to the Portland Metropolitan Exposition Center, and south along I-205 from Gateway to Clackamas regional center, including Portland Transit Mall improvements and south from the Portland Transit Mall to Milwaukie. then p Potentially high capacity transit could be extended to Vancouver, Washington. Provide interim bus service along McLoughlin Boulevard and Highway 224 from Clackamas regional center to the Portland central city until light rail service can be provided in this corridor.”
5. Specific Corridor Studies 6.7.6, (page 6-36) Amend the McLoughlin-Highway 224 section to read: “The recently completed South/North light rail Corridor study demonstrated the desirability and feasibility of both a long term need for high capacity transit service in this corridor, and a short term opposition to construction of light rail. light rail service to Clackamas Regional Center along I-205 from Gateway regional center, including improvements along the Portland Transit Mall as a first phase and between Milwaukie town center and downtown Portland as a second phase. However, the long term transit need is still critical, as demonstrated in the RTP

~~analysis where both highway and high capacity transit service were needed over the 20-year plan period to keep pace with expected growth in this part of the region. Therefore, the recommendations for this corridor study assume a short term rapid bus, or equivalent, transit service in the corridor, and light rail service is retained in the long term as a placeholder. Transportation solutions in this corridor should address the following design considerations:~~

~~Provide improved transit access to Milwaukie town center and between Gateway and Clackamas regional center,"s, including rapid bus in the short term, and light rail service from Clackamas regional center to Central City in the long term"~~

6. Amend the 2000 Regional Transportation Plan Appendix as shown below:

**2000 Regional Transportation Plan
Appendix**

RTP Project List
(Proposed transit changes related to the South Corridor Project)

RTP #	2040 Link	Jurisdiction	Project Name (Facility)	Project Location	Project Description	RTP Preferred System	RTP Strategic System	RTP Financially Constrained System	Est. Project Cost in 1998 dollars	RTP Program Years
1001	Region	Tri-Met	Light Rail Extension 4 <u>3</u>	Milwaukie Gateway RC to Clackamas TRC and Portland Transit Mall Extension	Construct LRT	X	X	X	\$ 250,000,000 \$ 349,000,000 (Gateway) \$ 151,000,000 (PDX)	2000-20
1003	Region	Tri-Met	Light Rail Extension 3 <u>4</u>	Rose Quarter Portland Transit Mall to Milwaukie TC	Construct LRT	X	X	X	\$ 750,000,000 \$ 514,000,000	2000-20