



DEPARTMENT OF TRANSPORTATION
URBAN MASS TRANSPORTATION ADMINISTRATION
WASHINGTON, D.C. 20590

Paul Bay

JUN 8 1978

Mr. Robert A. Burco
Director
Department of Transportation
Transportation Building
Salem, Oregon 97310

Mr. Peter Cass
General Manager
Tri-County Metropolitan
Transportation District
520 Southwest Yamhill
Portland, Oregon 97204

Dear Mr. Burco and Mr. Cass:

The following comments on the draft environmental impact statement (DEIS) for the Banfield Transitway were developed by a DOT team (Urban Mass Transportation Administration, Federal Highway Administration, and Office of the Secretary) which reviewed and evaluated all aspects of the document. The review process involved a detailed investigation of both the environmental analysis and the alternatives analysis. These comments should be addressed before selection of the preferred alternative. These comments also constitute the UMTA review of the DEIS as promised in my April 1, 1978 memorandum.

1. A TSM alternative which includes both arterial and freeway improvements should be considered. This alternative should combine the best features of the Low Cost Improvements (LCI) alternative as well as freeway ramp metering with HOV bypass lanes and provisions for bus transfers along the Banfield Freeway. The alternative warrants consideration because it provides for improved operation of the Banfield Freeway, including preferential treatment of HOV, while allowing for a minimal investment in freeway improvements.

*Done
regardless
of alt.*

2. A modified busway alternative which would minimize capital investments in the Banfield corridor should be evaluated. Specifically, it should consist of a separated reversible busway adjacent to the existing freeway with access and egress to major arterials (39th, 60th, and 82nd Avenues). This alternative should be designed with an objective

*Previously
studied*

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to reduce overall costs through the application of minimum design standards.

Similarly, the costs and effects of providing access and egress from the Busway alternatives (4a & 4b) to major arterials should be discussed.

- needed in any alt.*
3. It is our understanding that Tri-Met has developed a work program to examine the impact of using articulated buses in the analysis of alternatives. The information obtained from this study should be used before selecting the preferred alternative.
 4. The apparent inconsistency of standee policy for bus and light rail alternatives should be addressed.
 5. Marginal costs and effects of all alternatives (e.g., the additional cost per additional passenger) should be presented.
 6. The concerns raised on the travel forecasting procedures in UMTA's November 14, 1977 letter to Mr. Wentworth, copy attached, should be addressed.
 7. The bus system for the entire region, excluding the Banfield corridor, should be discussed describing the system and its costs.
 8. Additional information should be provided to support the conclusion that some alternatives offer more positive economic development and land use stimulus than others. A discussion of joint development opportunities would be particularly helpful.
 9. There should be an explanation of the reasons why joint LRT use with the Union Pacific rail facilities was not considered.

We recognize that these comments will require some additional analysis. We believe, however, that it is essential that this information be available to assure that the data is considered in the decision-making process. Therefore, we request that the analyses, including an assessment of possible environmental impacts, be made available for our review and evaluation before any further project decisions are made.

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We have discussed these comments with the FHWA Office of Highway Planning and they have indicated their concurrence.

Sincerely,

A handwritten signature in dark ink, appearing to read "CH Graves", written in a cursive style.

Charles H. Graves
Director, Office of Planning
Assistance

CC:

Dento U. Kent, CRAG
Glenn Green, FHWA