

**MAKING A
GREAT
PLACE**



Public comment report

2035 RTP Amendments

May 2013

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Clean air and clean water do not stop at city limits or county lines. Neither does the need for jobs, a thriving economy, and sustainable transportation and living choices for people and businesses in the region. Voters have asked Metro to help with the challenges and opportunities that affect the 25 cities and three counties in the Portland metropolitan area.

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Background

The Regional Transportation Plan (RTP) establishes a comprehensive policy direction for the regional transportation system and recommends a balanced program of transportation investments to implement that policy direction. The RTP is updated every four years, as required by federal law. In between full updates to the RTP, it may be necessary to amend the plan in response to changing local conditions and newly adopted plans. To be eligible to build a project with federal funds the project must first be included in the RTP.

Current proposed changes to the RTP project list include projects in Washington County, Hillsboro, Beaverton, Portland, East Multnomah County and Oregon Department of Transportation projects along Interstate 205 and Interstate 5.

Outreach approach

Metro compiled a list of all proposed project list changes, including detailed information and maps. From Friday, Feb. 22 to Monday, April 8, 2013 Metro held a 45-day public comment period on proposed project list changes for the 2035 RTP. Comments made during this period will be presented to decision makers for consideration before taking action in May. The public was asked to provide comment on any of the proposed projects using an online survey on the RTP amendments web page, by email, by mail or in person. Comments were also received on analysis of how these changes may affect regional air quality.

Metro's approach to publicize the comment period included:

- Email notices to the Transportation Policy Advisory Committee (TPAC), Metro Policy Advisory Committee (MPAC) and Joint Policy Advisory Committee on Transportation (JPACT) as well as several interested parties and environmental justice lists announcing the start of the public comment period and a follow-up reminder email midway through the comment period.
- Posts on the Metro News web site, the agency's main news blog, which reaches hundreds of news media and community members each day. The exact number of recipients varies depending on their own subscription settings.
- Advertisements were placed in five local newspapers, *The Oregonian*, *The Hillsboro Argus*, *The Beaverton Valley Times*, *The Gresham Outlook* and *The Portland Observer* advertising the public comment period. Advertisements in the latter three papers were provided in English and Spanish.
- Staff presentations to TPAC, JPACT, MPAC, Metro Technical Advisory Committee (MTAC) and the Metro Council.
- Web content with all proposed project and comment information, with a link from the Metro web home page and the main Regional Transportation Plan web page.
- Metro received 11 responses through the online survey and six comments were received through email.

Title VI: LEP Analysis/Translation

Limited English Proficiency (LEP) is a term used to describe people who do not speak English as their primary language and who also may have limited ability to read, write, or understand English. Metro's Data Resource Center conducted an analysis of the communities surrounding the proposed project areas, and found Spanish to be the most widely spoken language for those who don't speak English well. The Beaverton Crescent Street extension project, the East Metro Connections Plan projects, the City of Portland North Williams Traffic Safety Operations projects and the Oregon Department of Transportation projects were all determined to affect communities with LEP Spanish speaking populations at five percent or above.

To solicit input from Spanish speaking residents in these communities, advertisements announcing the RTP amendment public comment period were translated into Spanish in three newspapers, *The Gresham Outlook*, *The Beaverton Valley Times*, and *The Portland Observer*, thus allowing Metro to engage a wider and more diverse population of the community. Metro provides phone translation services for any language for community members providing comments or seeking information on the phone or in person. No comments or requests related to this round of RTP amendments were received in any language other than English.

SUMMARY OF COMMENTS RECEIVED

City of Beaverton - Crescent Street multimodal extension project

This project received two comments, one in favor and one against. The comment in support of the project stated that it would help with better street connectivity in the Beaverton area. The comment against stated that a higher priority should be funding projects on the other side of Beaverton.

City of Hillsboro- 253rd Street

One comment received in support of project. No changes requested.

City of Hillsboro - Brookwood Parkway

Metro received seven comments on the Brookwood Parkway proposal—five in favor and two opposed. One comment in opposition stated that widening the road would create increased speeds and traffic, leading to unsafe access for cyclists and pedestrians. Another commenter suggested a higher priority should be the South Hillsboro area. One commenter in favor of the project also focused on safety concerns for pedestrians and cyclists, noting that “walking or biking alongside a seven lane arterial would be incredibly unpleasant.”

Three comments in favor of the project were from the Greater Hillsboro Area Chamber of Commerce and the Westside Economic Alliance and the NAIOP Commercial Real Estate Development Association and all three comments noted the importance of roadway improvements in accommodating the anticipated increase in employment and traffic in the Hillsboro area.

City of Hillsboro - Butler Drive

Three comments were received on this project, two in favor and one against. The comment against noted that, “motor vehicle traffic already travels too fast on this road to allow safe access for pedestrians, cyclists, and assistive mobility devices. Widening roads will encourage drivers to go even faster.”

City of Hillsboro - Cornelius Pass Road

This project received six comments, five in favor and one against. Three comments in favor of the project were from the Greater Hillsboro Area Chamber of Commerce, Westside Economic Alliance and NAIOP Commercial Real Estate Development Association. All three comments noted the importance of roadway improvements in accommodating the anticipated increase in employment and traffic in the Hillsboro area.

The comment against stated that widening the road would lead to more dangerous conditions for pedestrians and cyclists. One comment in favor emphasized the need for cycle tracks or separated multi-use path for pedestrians and cyclists.

City of Hillsboro - Gibbs Drive

Metro received two comments in favor of this project, with one commenter noting that it will help catalyze development in the AmberGlen area.

City of Hillsboro - US 26 westbound off-ramp

All comments received were in favor of the project. Three comments in favor of the project were from the Greater Hillsboro Area Chamber of Commerce, Westside Economic Alliance and NAIOP Commercial Real Estate Development Association. All three comments noted the importance of roadway

improvements in accommodating the anticipated increase in employment and traffic in the Hillsboro area.

City of Portland - N. Williams Traffic Safety operations projects

Metro received four comments on the North Williams Traffic Safety Operations projects, three in opposition to the projects. One comment focused on the safety concerns of adding a left-side bike lane and another stated that a higher priority should be given to the Outer Powell Blvd. Conceptual Design area.

One comment was in favor of the projects, citing the high bicycle traffic and pedestrian demand in the area.

East Metro Connections Plan- 238th Drive

Metro received two comments in opposition to the East Metro Connections 242nd right of way project. One commenter suggested that a higher priority in this area would be creating planned communities and creating more opportunities for alternative means of transportation and the other noted that the project did not have enough “bang for the buck.”

East Metro Connections Plan policy changes

No comments received.

Oregon Department of Transportation- I-205 - Extending the auxiliary lane on I-205 SB from I-84 EB entrance

Two comments were received in opposition to the I-205 project, extending the auxiliary lane on I-205 southbound from the I-84 entrance. The comments provided views about what the priorities should be for regional planning, specifically fixing Allen Blvd. and Highway 217 and creating more bike boulevards.

Oregon Department of Transportation I-205- Extending the existing acceleration lane on I-205 NB from Powell entrance ramp

No comments received.

Oregon Department of Transportation- I-5 - Extend I-5 SB auxiliary lane from Lower Boones Ferry exit-ramp to Lower Boones Ferry entrance-ramp

Metro received four comments on this project, three in support and one against. The comments in favor of the project noted that the project would help reduce southbound congestion on I-5. The cities of Tualatin, Wilsonville, Tigard, Lake Oswego and Washington County and the Tualatin and Wilsonville Chambers of Commerce emphasized that the project would help improve traffic flow, lane balance and time reliability and as a result reduce congestion and improve economic vitality, air quality and safety.

The comment in opposition stated that a higher priority should be fixing Allen Blvd. and Highway 217.

Washington County - Scholls Ferry Road: Roy Rogers to Teal Blvd. project

All comments received expressed support for the project, with most saying it would help with mobility and safety needs while reducing bottlenecks in the area. One commenter emphasized the need for bike lanes, particularly just east of Teal Blvd.

Air quality conformity Analysis

A letter was received from Jon Ostar, Director of Organizing People / Activating Leaders (OPAL) that raise questions regarding Metro's ability to adopt any amendments to the RTP at this time since the region is not currently in compliance with a Transportation Control Measure (increase transit service by 1% per year) included in the Area CO Maintenance Plan.

**2035 REGIONAL TRANSPORTATION PLAN (RTP) AMENDMENTS
CITY OF BEAVERTON - CRESCENT STREET MULTIMODAL EXTENSION PROJECT**

April 2013

97124	City of Beaverton - Crescent Street multimodal extension project	Yes	The central part of Beaverton could use better street connectivity like this.
97225	City of Beaverton - Crescent Street multimodal extension project	No	Beaverton has already spent enough money on that part of town. How about a eastbound right-angle-to-the-tracks bicycle crossing for 5th at the railroad tracks, west of Griffith?

**2035 REGIONAL TRANSPORTATION PLAN (RTP) AMENDMENTS
CITY OF HILLSBORO - 253RD STREET**

April 2013

Zip code	Project	Do you support adding this project to the RTP? Comments
97225	City of Hillsboro - 253rd Street	Yes

**2035 REGIONAL TRANSPORTATION PLAN (RTP) AMENDMENTS
HILLSBORO-BROOKWOOD PARKWAY PROJECT**

April 2013

Zip code	Project	Do you support adding this project to the RTP?	Comments
97123	City of Hillsboro - Brookwood Parkway	No	Every one of the Hillsboro projects is designed to benefit people in North Hillsboro. There are severe transportation issues in South Hillsboro that are being totally ignored. I don't see any improvements to TV Highway on this list. The TV Highway Corridor Study was a joke and an insult to Hillsboro residents since the suggested improvements will only make it worse for South Hillsboro people to go anywhere in this city. I am disgusted with Hillsboro and the Metro Council for adding the South Hillsboro area to the Urban Growth Project and not have one single transportation improvement listed to support it.
97124	City of Hillsboro - Brookwood Parkway	No	Motor vehicle traffic already travels too fast on this road to allow safe access for pedestrians, cyclists, and assistive mobility devices. Widening roads will encourage drivers to go even faster. More lanes = more distraction = more danger. Also, this increased traffic will negatively impact nearby farmland.
97124	City of Hillsboro - Brookwood Parkway	Yes	While, the idea of supporting seven lane arterial roads is difficult for me, I would prefer that they propose cycle tracks or separated multi-use paths for pedestrians and cyclists. Walking or biking alongside a seven lane arterial would be incredibly unpleasant.
97225	City of Hillsboro - Brookwood Parkway	Yes	

**2035 REGIONAL TRANSPORTATION PLAN (RTP) AMENDMENTS
CITY OF HILLSBORO - BUTLER**

April 2013

Zip code	Project	Do you support adding this project to the RTP?	Comments
97124	City of Hillsboro - Butler Drive	No	Butler Drive currently provides lower speed and traffic access for pedestrians, bikes, and assistive mobility devices to reach the library from points east. Increasing lanes will likely increase speeding, already an issue noted by frequent use of radar on the road. Intel should provide more incentives for employees to choose mass and/or active transportation and/or shorter commute location.
97124	City of Hillsboro - Butler Drive	Yes	
97225	City of Hillsboro - Butler Drive	Yes	

**2035 REGIONAL TRANSPORTATION PLAN (RTP) AMENDMENTS
CITY OF HILLSBORO - CORNELIUS PASS ROAD**

April 2013

Zip code	Project	Do you support adding this project to the RTP?	Comments
97124	City of Hillsboro - Cornelius Pass Road	No	Motor vehicle traffic already travels too fast on this road to allow safe access for pedestrians, cyclists, and assistive mobility devices. Widening roads will encourage drivers to go even faster. More lanes = more distraction = more danger. Also, this increased traffic will negatively impact nearby farmland.
97124	City of Hillsboro - Cornelius Pass Road	Yes	While, the idea of supporting seven lane arterial roads is difficult for me, I would prefer that they propose cycle tracks or separated multi-use paths for pedestrians and cyclists. Walking or biking alongside a seven lane arterial would be incredibly unpleasant.
97225	City of Hillsboro - Cornelius Pass Road	Yes	

**2035 REGIONAL TRANSPORTATION PLAN (RTP) AMENDMENTS
CITY OF HILLSBORO - GIBBS DRIVE**

April 2013

Zip code	Project	Do you support adding this project to the RTP?	Comments
97124	City of Hillsboro - Gibbs Drive	Yes	This will help be a catalyst for sustainable development in the planned AmberGlen area
97225	City of Hillsboro - Gibbs Drive	Yes	

**2035 REGIONAL TRANSPORTATION PLAN (RTP) AMENDMENTS
CITY OF HILLSBORO - US 26 WESTBOUND OFF-RAMP**

April 2013

Zip code	Project	Do you support adding this project to the RTP?	Comments
97124	City of Hillsboro - US 26 westbound off-ramp	Yes	How do all of these projects tie into the mass transit system and is the mass transit system being developed to help reduce this commuter traffic?
97124	City of Hillsboro - US 26 westbound off-ramp	Yes	

**2035 REGIONAL TRANSPORTATION PLAN (RTP) AMENDMENTS
N. WILLIAMS AND RODNEY PROJECT**

April 2013

Zip code	Project	Do you support adding this project to the RTP?	Comments
97216	City of Portland - N. Williams Traffic Safety operations projects	No	I'm surprised that this project is being added, and not the Outer Powell Blvd Conceptual Design area, from SE 92nd to SE 176th, which has widespread public and state legislative approval, in an otherwise poorer, multi-ethnic area of the City of Portland.
97221	City of Portland - N. Williams Traffic Safety operations projects	Yes	The with all the bicycling traffic and pedestrian demand, this makes sense.
97214	City of Portland - N. Williams Traffic Safety operations projects	No	I am a strong supporter and advocate of better bicycle facilities. However, I do not support the N Williams Traffic Safety project in its current form. A left-side bike lane (with some sections shared with motor vehicles) will lead to more dangerous conditions for bikes. Drivers are not used to left-side bike lanes, and N Williams has many left turns and left-side driveways, so the danger of left hooks will be significant. A New Seasons grocery is currently under construction just north of Cook St. The entrance to their parking lot will require cars to cross over the bike lane, and during peak times cars will get backed up into the busy Cook intersection as they wait for bikes to pass. The city has not addressed how bikes will transition from the right side to the left side near Broadway. Finally, the project description partly justifies the project based on N Williams being designated a City Bikeway in the Bike Plan, which calls for a "separated in-roadway bike facility." N Williams already has a right-hand bike lane, which meets that definition. Funding should go toward the many roads in the bike plan that have no facility, not on "upgrading" this facility in a way that will make it less safe, not more safe.

**2035 REGIONAL TRANSPORTATION PLAN (RTP) AMENDMENTS
N. WILLIAMS AND RODNEY PROJECT**

April 2013

Zip code	Project	Do you support adding this project to the RTP?	Comments
97225	City of Portland - N. Williams Traffic Safety operations projects	No	I've been following this project on bikeportland.org. What started out as a simple safety improvement has ballooned into a boondoggle. Turn down funding for this mess.

**2035 REGIONAL TRANSPORTATION PLAN (RTP) AMENDMENTS
EAST METRO CONNECTIONS - 238TH DRIVE**

April 2013

Zip code	Project	Do you support adding this project to the RTP?	Comments
97086	East Metro Connections Plan - 242nd right-of-way	No	I understand the necessity at some level to take a micro perspective to solving Metro's transportation problems but it must start from a global perspective. The solution to our transportation problems is planned communities. We have to get behind projects that create jobs, reduce the requirement for additional roads and road maintenance and promote alternative means of transportation. Planned communities do that and there is a planned community coming out of the ground soon East of Clackamas Town Center and I205 called Eagle Landing. It provides connectivity to the terminus to the green line, multimodal transportation systems, multicultural neighborhoods, many local businesses and creates a SE urban center and jobs called Eagle Landing. Please get behind this project to ensure its success! This is a unique opportunity for our state and Metro to provide cutting edge development that can be a model for other communities and jurisdictions. If this is done right with state and local support it can be a model for the country to consolidate infrastructure, culture in a meaningful way and increase the tax base without increasing maintenance costs and requirements. We would be happy to discuss this further with Metro. Lake did a masterful job of presenting the active RTP to the CC Ped/Bike committee Tuesday night. This is a way to meet the Metro goals and I don't see a sustainable way other than planned communities. EL needs your backing!
97124	East Metro Connections Plan - NE 238th Drive: Halsey Street to Gilisan Street	No	This project doesn't seem to have a lot of bang for the buck, even though this stretch of road is a safety concern.

**2035 REGIONAL TRANSPORTATION PLAN (RTP) AMENDMENTS
I-205 - EXTENDING AUXILIARY LANE ON I-205 SB FROM I-84 EB ENTRANCE**

April 2013

Zip code	Project	Do you support adding this project to the RTP?	Comments
97213	I-205 - Extending the auxiliary lane on I-205 SB from I-84 EB entrance	No	First the URL is broken, please fix it. Second, for the price of extending a freeway lane, you could complete miles and miles of bike boulevards instead, so I wouldn't encounter dozens of stop signs on my 4-mile 1-way bike commute in NE Portland. Just turning a few more stop signs would be a big help, and it would cost a lot less than freeway lanes.
97225	I-205 - Extending the auxiliary lane on I-205 SB from I-84 EB entrance	No	It says on the Metro site that ODOT wants to take away funding from fixing Allen and 217 to fund this project. No, I'd rather see Allen and 217 fixed.

**2035 REGIONAL TRANSPORTATION PLAN (RTP) AMENDMENTS
 ODOT I-5 SOUTHBOUND**

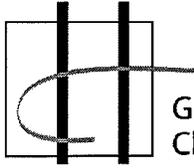
April 2013

Zip code	Project	Do you support adding this project to the RTP?	Comments
97124	I-5 - Extend I-5 SB auxiliary lane from Lower Boones Ferry exit-ramp to Lower Boones Ferry entrance-ramp	Yes	The Portland metro area is difficult to leave SB due to weaving conflicts like this.
97225	I-5 - Extend I-5 SB auxiliary lane from Lower Boones Ferry exit-ramp to Lower Boones Ferry entrance-ramp	No	It says on the Metro site that ODOT wants to take away funding from fixing Allen and 217 to fund this project. No, I'd rather see Allen and 217 fixed.

**2035 REGIONAL TRANSPORTATION PLAN (RTP) AMENDMENTS
WASHINGTON COUNTY - SCHOLLS FERRY ROAD**

April 2013

Zip code	Project	Do you support adding this project to the RTP?	Comments
97123	Washington County - Scholls Ferry Road: Roy Rogers to Teal Blvd. project	Yes	Much needed to improve this commuter route bottleneck.
97008	Washington County - Scholls Ferry Road: Roy Rogers to Teal Blvd. project	Yes	Mobility and safety needs today. Especially during peak hours and weekends.
97225	Washington County - Scholls Ferry Road: Roy Rogers to Teal Blvd. project	Yes	Make sure there are bike lanes, particularly just east of Teal.



Greater Hillsboro Area
Chamber of Commerce

April 2, 2013

Metro
600 NE Grand Avenue
Portland, OR 97232

RE: Support for the City of Hillsboro's RTP Amendment Projects

Dear Metro Council President, Metro Councilors, Advisory Committee Members and Staff:

The Hillsboro Chamber of Commerce would like to express our strong support of the City of Hillsboro's regional transportation plan amendment projects: The widening of Brookwood Parkway, Cornelius Pass Road and U.S. 26/Cornelius Pass Road interchange westbound loop. These projects are not only vital for the city of Hillsboro and our business community, but for the entire Portland metropolitan area.

These roadway improvements are driven by the increased employment of our industrial and traded sector companies. We anticipate and frankly hope that trend of increased employment continues. The improvements identified have been through an extensive technical analysis reviewed and endorsed by the City of Hillsboro, Washington County and ODOT. While these improvements address an important capacity issue they are also inherently tied directly to safety concerns alleviating the situation of having peak morning commute traffic queue up and spill out onto U.S. 26 and providing for a safer, smoother flow of afternoon traffic that is not required to make last minute lane changes in order to navigate congested bottleneck arterials. These improvements are not solely for commute traffic but also take into consideration the significant needs of our high tech Silicon Forest companies for adequate freight mobility.

The Hillsboro Chamber is more than satisfied that the City of Hillsboro has adequately demonstrated the need for the seven-lane projects and why other solutions explored are not adequate to meet the continued growing traffic demand.

Your consideration and support of the City of Hillsboro's RTP Amendment Projects is greatly appreciated.

Sincerely,

Doug Barrett
Chair of the Board

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May 2013



*The leader in advocating
for a healthy economic environment*

April 2, 2013

Metro
600 NE Grand Ave
Portland, OR 97232

Re: Support for City of Hillsboro RTP Amendment Projects

Dear Metro Council, Advisory Committee members, and staff:

I am writing on behalf of Westside Economic Alliance (WEA) to support the City of Hillsboro's proposed Regional Transportation Plan (RTP) amendment projects.

In particular, we would like to offer our support for the widening of Brookwood Parkway, Cornelius Pass Road, and the US 26/Cornelius Pass Road interchange westbound loop off-ramp. Brookwood Parkway and Cornelius Pass Road are two vital arterials connecting the industrial and high tech businesses in Hillsboro to US 26 and the rest of the region.

A significant number of workers travel on these two roadways to commute to and from their jobs, and businesses rely on these two roadways for efficient movement of products and goods. As existing businesses continue to grow and expand and new businesses are attracted to the area, it is critical that these two roadways and the surrounding network provide the necessary mobility for workers and freight movement.

Currently, there is already significant delay and congestion on Brookwood Parkway and Cornelius Pass Road during the peak travel hours of the day; this problem is only going to worsen if improvements are not made to the two facilities. Therefore, WEA supports the proposed improvements by the City of Hillsboro.

The proposed widening of Brookwood Parkway and Cornelius Pass Road, and the westbound off-ramp at the US 26/Cornelius Pass Road interchange are critical improvements to ensure continued mobility for the businesses and workers in the industrial and high tech area in Hillsboro and Washington County.

Westside Economic Alliance is a business advocacy group, representing members from both the public and private sectors in Washington and western Clackamas counties. Together we work to improve the local business climate and the economic health of our region.

Westside Economic Alliance is a business advocacy group, representing members from both the public and private sectors in Washington and western Clackamas counties. Together we work to maintain and build upon the vibrant economy of the area we serve.

Sincerely;

A handwritten signature in cursive script, appearing to read "Pamela H. Smith".

Executive Director
Westside Economic Alliance

NAIOP

COMMERCIAL REAL ESTATE
DEVELOPMENT ASSOCIATION
OREGON CHAPTER

April 3, 2013

Metro Council
600 NE Grand Ave.
Portland, OR 97232

RE: Support for City of Hillsboro RTP Amendment Projects

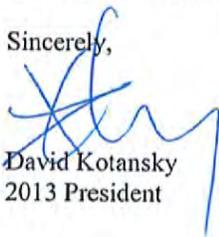
Dear President Hughes, Councilors, Advisory Committee members, and staff:

On behalf of NAIOP Oregon's 168 members, I am writing to support the City of Hillsboro's proposed regional Transportation Plan (RTP) amendment projects. One of the fundamental goals of our organization is to advocate for measures that foster a regional environment conducive to expansion of our industrial and commercial employment base—we believe strongly that the amendment projects proposed by the City of Hillsboro are crucial to such an expansion in Washington County.

In particular, we are supportive of the widening of Brookwood Parkway, Cornelius Pass Road, and US 26/Cornelius Pass Road interchange westbound loop off-ramp. Brookwood Parkway and Cornelius Pass Road are two crucial arterials connecting the industrial and high tech businesses in Hillsboro to US 26 and the rest of the region. A significant number of workers travel on these two roadways to commute to/from their jobs, and businesses rely on these two roadways for efficient movement of products and goods. As existing businesses continue to grow and expand, and new employers are attracted to the area, it is critical that these two roadways and the surrounding network provide the necessary mobility for workers and freight movement. Currently, there is already significant delay and congestion on Brookwood Parkway and Cornelius Pass Road during the peak travel hours of the day; this problem is only going to become worse if improvements aren't made to the two facilities. Therefore, we support the proposed improvements by the City of Hillsboro.

Thank you for your consideration of our input and please let me know if we can provide any additional information.

Sincerely,



David Kotansky
2013 President

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April 8, 2013

John Mermin, Senior Transportation Planner
Metro Planning & Development
600 NE Grand Avenue
Portland, OR 97232-2736

RE: 2035 Regional Transportation Plan (RTP) Amendments

Dear Mr. Mermin:

On behalf of the Tualatin and Wilsonville Chamber of Commerce's we'd like to express our support for the inclusion of the Interstate-5 South Bound auxiliary lane from the Lower Boones Ferry Road entrance-ramp to the Nyberg Street exit-ramp in the 2035 Regional Transportation Plan (RTP). Efficient transportation is the number one priority for many of our local businesses. During a recent meeting of more than 60 key leaders of businesses in Tualatin, they expressed their strong belief that transportation was the #1 impediment to growing their business, particularly in regards to employees commuting into our business areas.

Given the high prevalence of businesses in the manufacturing, warehousing, and distribution sectors, our economic vitality depends on a well functioning transportation system. Nowhere else in our communities is this more integral than on I-5. Traffic volume is extremely high along this section of I-5. Further complicating the situation is the high volume of weaving movement between Highway 217 and the Nyberg Street exit-ramp. The addition of this small section of auxiliary lane will reduce congestion, improve lane balance and travel time reliability, and sustain stable traffic flow. In addition, it is anticipated to result in a 30% reduction in mainline crashes.

Removing bottlenecks and improving traffic operations along I-5 benefits many of the local streets that feed into I-5. As a result of improved traffic flow, local and regional businesses will spend less time transporting goods and more time positively contributing to our communities.

Thank you for the opportunity to express our support for including this project in the 2035 RTP.

Sincerely,

A handwritten signature in blue ink that reads 'Linda Moholt'.

Linda Moholt
CEO, Tualatin Chamber of Commerce

A handwritten signature in blue ink that reads 'Steve Gilmore'.

Steve Gilmore
CEO, Wilsonville Chamber of Commerce

cc: Tualatin Chamber Board of Directors
Wilsonville Chamber Board of Directors



April 8, 2013

John Mermin, Senior Transportation Planner
Metro Planning & Development
600 NE Grand Avenue
Portland, OR 97232-2736

RE: 2035 Regional Transportation Plan (RTP) Amendments

Dear Mr. Mermin:

The Cities of Tualatin, Wilsonville, Tigard, Lake Oswego and Washington County appreciate the opportunity to express our support for the inclusion of the Interstate-5 South Bound auxiliary lane from the Lower Boones Ferry Road entrance-ramp to the Nyberg Street exit-ramp in the 2035 Regional Transportation Plan (RTP). Given our location along I-5, the economy of our cities and county is driven by the manufacturing, warehousing, and distribution sectors. Our economic vitality, air quality, and safety depend on a well functioning transportation system.

In 2009, ODOT began the Corridor Bottleneck Operations Study (CBOS) which identified this section of I-5 as a major bottleneck. The study analyzed potential solutions and found the auxiliary lane to provide the best value of benefits and costs when compared to other bottleneck solution projects.

Traffic volume is extremely high along this section of I-5. Further complicating the situation is the high volume of weaving movement between Highway 217 and the Nyberg Street exit-ramp. The addition of this small section of auxiliary lane will reduce congestion, improve lane balance and travel time reliability, and sustain stable traffic flow. In addition, it is anticipated to result in a 30% reduction in mainline crashes. As a result of improved traffic flow, local and regional businesses and residents will spend less time in traffic and more time positively contributing to our communities.

Thank you for the opportunity to express our support for including this project in the 2035 RTP. The Cities of Tualatin, Wilsonville, Tigard, Lake Oswego and Washington County are eager to work with ODOT and other regional partners on this integral regional transportation investment.

Sincerely,

Lou Ogden
Mayor
City of Tualatin

Tim Knapp
Mayor
City of Wilsonville

John Cook
Mayor
City of Tigard

Mike Kehoe
Council President
City of Lake Oswego

Andy Duyck
Chair
Washington County
Board of Commissioners

cc: Tualatin City Council
Wilsonville City Council
Tigard City Council
Lake Oswego City Council
Washington County Board of Commissioners
Jason Tell, ODOT Region 1



April 8, 2013

John Mermin
Metro
600 NE Grand Ave
Portland, OR 97232
rtp@oregonmetro.gov

Re: OPAL comments to Metro's Proposed RTP Amendments

Dear Mr. Mermin,

Metro must comply with the Transportation Control Measures (TCM) included in the Area CO Maintenance Plan¹ before approving amendments to its Regional Transportation Plan (RTP). **The RTP is currently not in compliance with the Transit Service Increase TCM requiring a 1.0% average annual growth in transit revenue hours,**² and none of the proposed amendments to the RTP provide for any increase in public transportation services.

The Second Portland Area CO Maintenance Plan, approved by the Oregon Environmental Quality Commission and US EPA, includes a Transit Service Increase TCM intended to meet air quality requirements. This TCM requires regional transit service *revenue* hours (weighted by capacity) to be increased by 1.0% per year, based on a 5 year rolling average.³ Despite this requirement, Metro's latest Air Quality Conformity Determination incorrectly uses total *vehicle* hours to assess compliance.⁴

Total vehicle hours include both revenue hours (when transit vehicles are available for use by the public) and non-revenue hours (when transit vehicles are running but not available for public use, such as out-of-service buses or hours spent traveling to or from active service). The TCM requires an analysis of revenue service hours only because non-revenue hours do not contribute to area CO emissions reductions. Revenue hours alone are the correct measure to ensure compliance with the TCM.

¹ OAR 340-252-0140 and 40 CFR 93.113

² "Approval and Promulgation of State Implementation Plans: Oregon: Portland Carbon Monoxide Second 10-Year Maintenance Plan," 70 Fed. Reg. 52956-52960 (Sept. 6, 2005) at 52959.

³ *Id.* (emphasis added)

⁴ Compare Air Quality Conformity Determination (Feb. 14, 2013), p14, Table 3, with TriMet Service and Ridership data: <http://trimet.org/pdfs/publications/trimetridership.pdf>

Moreover, Metro's assessment does not use the most recent data available, such as the fare increases and service cuts that TriMet approved last June, which took effect last September. By failing to incorporate the most recent price and service changes, it is likely that the effects on overall ridership, and therefore air quality conformity, are inaccurate.

In fact transit service revenue hours (weighted by capacity) in the Metro region have *decreased* by a total of 2.1% during the five-year period from 2007-11 (the period in which Metro assessed compliance), with an annual decrease of 0.22%.⁵ Considering the most recent five-year period for which data is available (2008-12), transit revenue hours have decreased by an annual average of 0.15%.⁶

Metro must demonstrate compliance with the Transit Service Increase TCM before it approves these proposed RTP amendments. It is likely that, when incorporating 2012 TriMet data, along with applying the correct transit service revenue hours, the proposed RTP amendments do not provide for RTP compliance with the 1.0% average annual growth in transit service required by the TCM. In order to meet this requirement, Metro must include amendments that increase transit service revenue hours in TriMet's service district. Metro should also re-evaluate some of the Major Transportation Project Assumptions in determining compliance.⁷

Sincerely,

/s/ Jonathan Ostar

Jonathan Ostar, Director
OPAL Environmental Justice Oregon

⁵ See the attached spreadsheet disaggregating transit service revenue hours. Portland Streetcar revenue hour data was excluded from this analysis because it is not available to the public, but is unlikely to significantly impact overall revenue hours because streetcars have less capacity than buses, requiring a downward weighting for this analysis.

⁶ The weighting of service hours by capacity further distorts the picture of service hours. While light-rail (LRT) does have greater capacity than buses, increased capacity is not equivalent to increased service frequency, the most significant component of transit service, and assumes that capacity is being met. The reduction in service revenue hours over the past five years becomes much more substantial when weighting by capacity is discounted.

⁷ Metro should remove the Lake Oswego Streetcar Project from the RTP, as that project is dead, while it has seemingly omitted the Outer SE Powell Blvd. improvements, for which there is strong community stakeholder support.

Appendix

TriMet Revenue Service Hours (Weighted by Capacity)

<u>Year</u>	<u>BUS</u>	<u>MAX</u>	<u>WES</u>	<u>Total</u>	<u>Annual Change</u>
2006	1,458,564	949,726		2,408,290	
2007	1,481,460	944,221		2,425,681	0.72%
2008	1,511,880	980,119		2,491,999	2.73%
2009	1,534,068	1,015,782	3,027	2,552,877	2.44%
2010	1,461,396	1,059,936	7,311	2,528,643	-0.95%
2011	1,336,572	1,031,886	7,340	2,375,798	-6.04%
2012	1,342,296	1,051,035	7,283	2,400,614	1.04%
<u>2007-11</u>	-9.78%	9.28%	NA	-2.1%	-0.22%
<u>2008-12</u>	-11.22%	7.24%	NA	-3.7%	-0.15%

Rail Mode

MAX

WES

Bus Equivalent

4.88

2.04