

November 24, 2014

Planning and Sustainability Commission
City of Portland
1900 SW 4th Avenue
Portland, OR 97201

Re: Station Area Zoning on SE 17th Avenue

Dear Commissioners:

Next fall will mark the opening of TriMet's Orange Line—the Portland-Milwaukie Light Rail Transit Project (PMLR). A point of success for this project is the time and effort the Bureau of Planning and Sustainability (BPS) staff has invested to examine land uses along the PMLR corridor. BPS's efforts have been significant. It has conducted station area planning at the Lincoln St/SW 3rd Ave, OMSI/SE Water Ave, and Clinton/SE 12th Ave Stations. The resulting station area plans leverage the PMLR Project to zone for the types of vibrant, smart, transit-oriented communities Portland is known for.

I write to request your help with zoning limits currently proposed for the SE 17th Ave & Rhine St and SE 17th Ave & Holgate Blvd Stations. Although properties near these stations and along the west side of SE 17th Avenue are currently designated Mixed Employment, during Task 5 of the City's Comprehensive Plan Project, BPS staff recently indicated they propose to prohibit housing on *all* employment properties. This would be detrimental to the potential of these PMLR stations. TriMet respectfully requests BPS change the Comprehensive Plan Map from Mixed Employment to Mixed Use along the west side of SE 17th Avenue (Exhibit A). A Mixed Use designation will allow active uses that benefit the station areas and build a more transit supportive neighborhood.

TriMet's concern with the changes proposed by BPS is more than just theoretical, as TriMet owns and plans to offer for development three parcels of vacant land along SE 17th Ave (Exhibit B). If rezoned and allowed to develop in a transit-oriented manner, these parcels could contribute significantly to the activity and safety of the station areas.

Staff from TriMet and BPS recently discussed the viability of employment uses on TriMet's properties. During these discussions, BPS raised several concerns about zoning for housing along SE 17th Avenue that I would like to address.

1. Rezoning EG property on SE 17th Avenue reduces the amount of land available for employment uses.

There are over 1,000 acres of EG property in the City of Portland. TriMet proposes to change less than one-half of a percent—6.4 acres—to Mixed Use. The benefits of creating lively station areas far outweigh keeping .5 percent of land as Mixed Employment. Furthermore, TriMet's properties on the west side of SE 17th Avenue have small and/or odd configurations that challenge

redevelopment in many ways. If these properties remain employment only, without the opportunity for housing, they may be undeveloped or used for parking, which would degrade the quality of the station areas.

2. Employment uses are financially feasible.

A BPS memo on employment feasibility found that a significant discount to the land cost would be necessary for light industrial projects to be feasible, and that office projects were not feasible on Trimet-owned properties. This is not a strong indication of employment feasibility. Additionally, Trimet's analysis of trip generation shows that light industrial uses produce significantly fewer transit trips than does housing (Exhibit C). Trimet believes that the current multifamily market will make projects feasible and maximize activity around the station areas.

3. There are public health concerns regarding poor air quality and noise next to a truck and train route and Trimet's bus yard.

BPS published a DEQ air quality risk map (Exhibit D) that shows the risk to air quality on SE 17th Avenue is in the middle range, lower than downtown, where housing is strongly supported. Good design and appropriate materials can further address these concerns and create multifamily units with comfortable environments.

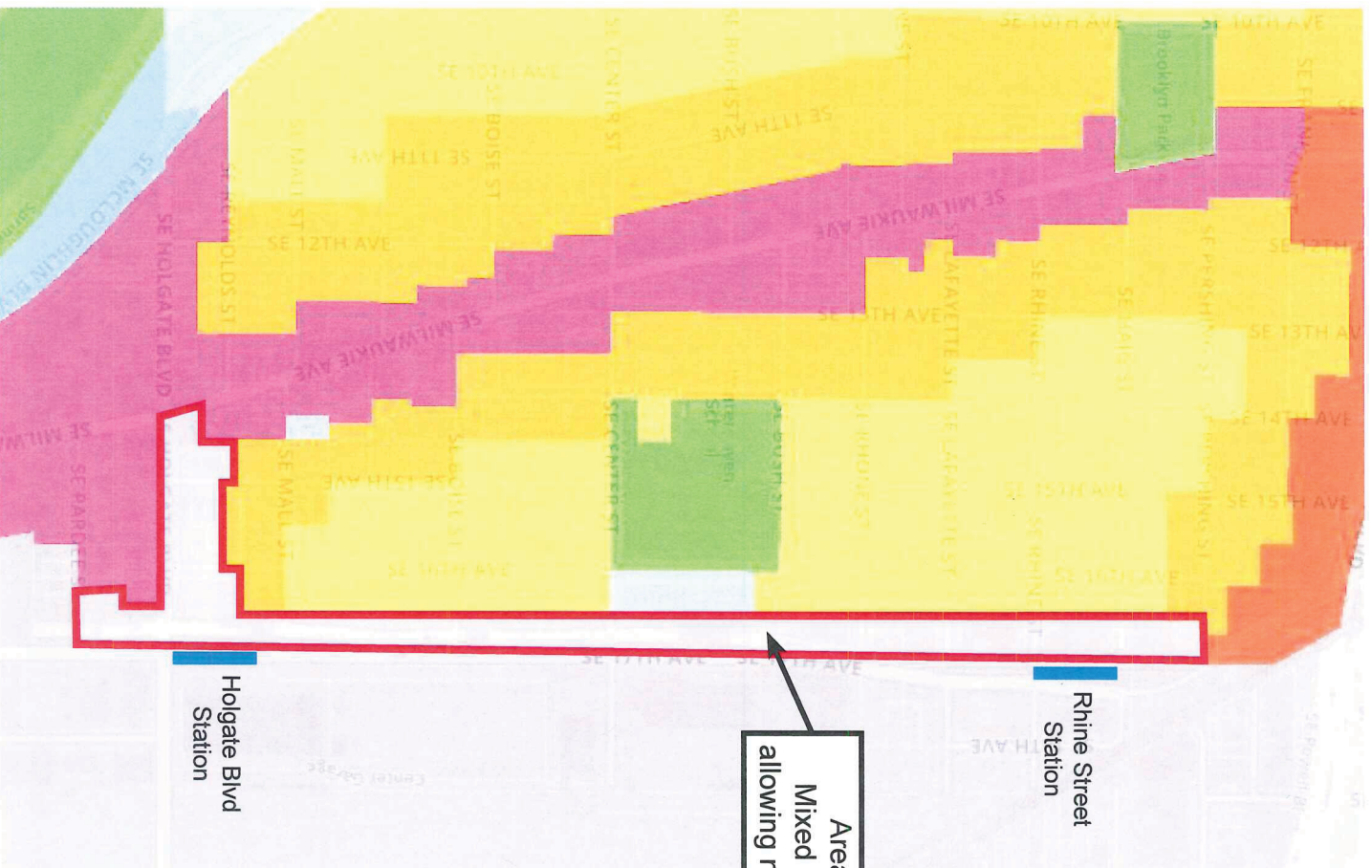
Trimet desires station areas that are conducive to public transportation. To this end, Trimet seeks to leverage the properties it owns along SE 17th Avenue to create transit-oriented developments that can leverage the significant investment our region made in PMLR. Please help Trimet to meet its goals for vibrant, safe station environments and maximum ridership. I respectfully ask for BPS's assistance in creating better station areas by changing the Comprehensive Plan Map to show a Mixed Use designation west of SE 17th Avenue.

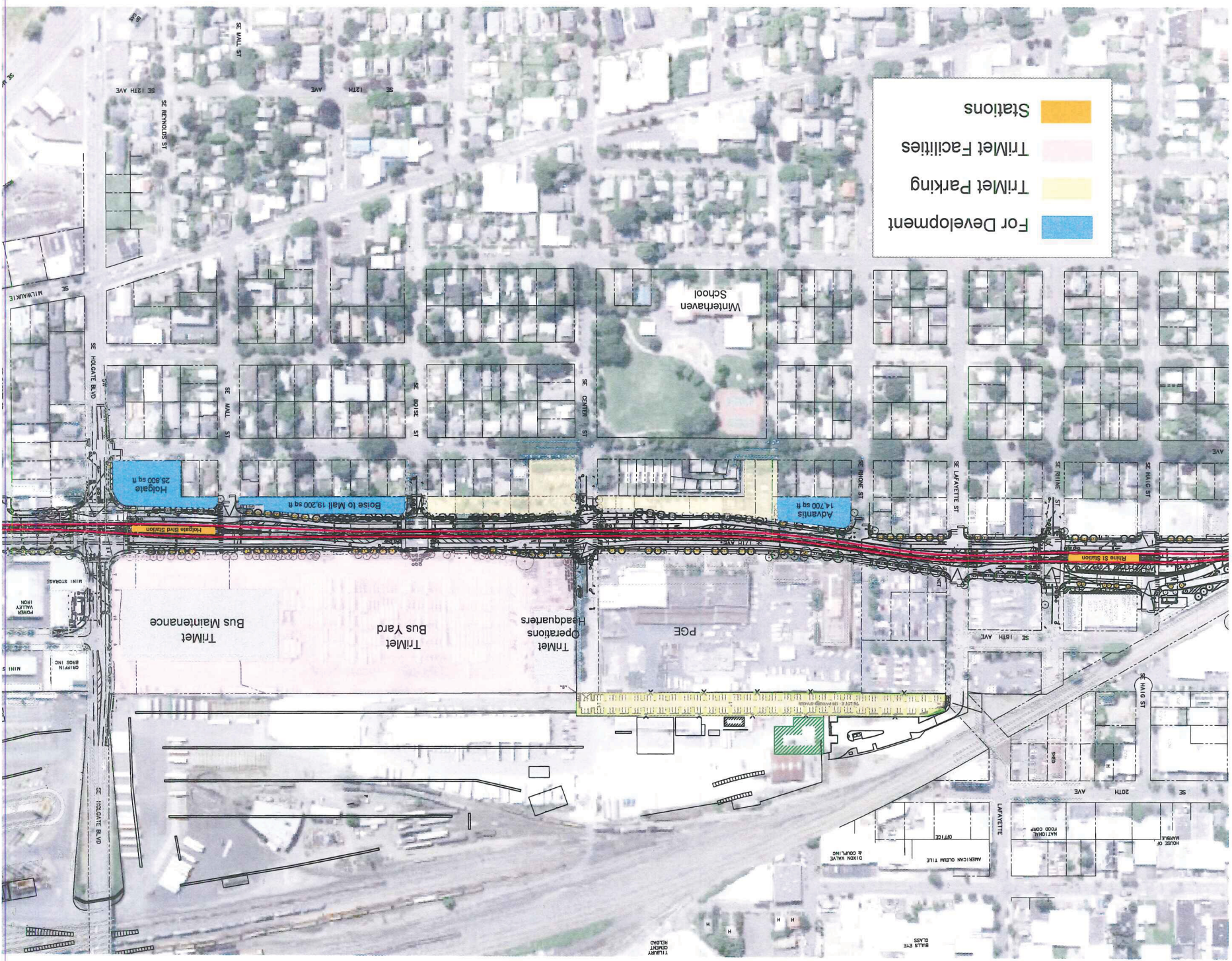
Sincerely,



Neil McFarlane
General Manager
Trimet

C: Susan Anderson, Director, Bureau of Planning and Sustainability
Joe Zehnder, Chief Planner, Bureau of Planning and Sustainability





Trimet- Comprehensive Plan Comments

Exhibit C

Estimated Trip Generation

Boise Mall multi-family project
 23,500 sq. ft. total
 36 units + circulation
 330 to 1000 sq. ft. units

Similar size employment project
 23,500 sq. ft. total

Use	Size	Units	per Day Trips or Factor (from ITE)	Unit	Mode Split	Trips Transit	per Year Avg. Days	Transit Trips Annual	Difference from residential
residential	36	unit	6.5	Household	0.12	28.08	347 ⁽¹⁾	9,744	0
light industrial	23,500	sqft	6.97	1000/sf	0.12	19.66	260 ⁽²⁾	5,110	-4,633
light industrial	23,500	sqft	6.97	1000/sf	0.12	19.66	347 ⁽³⁾	6,820	-2,923

- ¹ residential, subtract holidays
- ² employment, weekdays only
- ³ employment, subtract holidays

Air Quality

- Mid-range risk

Risk compared to benchmark (# of times above benchmark)



Annual Average Risk Model shows concentrations in 2005 compared to DEQ benchmarks. These data were provided by the Oregon Department of Environmental Quality and are based on air quality modeling from their Portland Air Toxics Solutions (PAT5) project

