



Bureau of Planning and Sustainability
Innovation. Collaboration. Practical Solutions.

Portland Planning and Sustainability Commission

Katherine Schultz, Chair

Michelle Rudd, Vice Chair

Jeff Bachrach
André Baugh
Ben Bortolazzo
Mike Houck

Chris Smith, Vice Chair

Katie Larsell
Andrés Oswill
Eli Spevak
Teresa St Martin

Mark Assam
Federal Transit Administration Region 10
Jackson Federal Building, Suite 3142 915
Second Avenue Seattle, WA 98174

Chris Ford
Metro 600 NE Grand Avenue
Portland, OR 97232

David Unsworth
TriMet 1800 SW 1st Avenue
Portland, OR 97201

The Portland Planning and Sustainability Commission (PSC) has responsibility for the stewardship, development and maintenance of Portland's Comprehensive Plan, Climate Action Plan and Zoning Code. By holding public hearings and discussing issues and proposals, the PSC develops recommendations to share with City Council in hopes of creating a more prosperous, educated, healthy and equitable city.

A central feature of Portland's Comprehensive Plan is directing growth to a network of centers and transit corridors. Over the next 20 years, we expect 70 percent of Portland's growth to occur in the Central City and along major transit lines. We have also adopted ambitious transportation planning goals to reduce greenhouse gas emissions, cut vehicle miles travelled, and double the share of commuters who use transit – to 25 percent by 2035. Full build-out of the regional light rail system is a critical element of our land use plans and Climate Action goals. The Southwest Corridor is the last major spoke in this regional system. Development of high-capacity transit in a dedicated right of way in this corridor helps to advance many of the City's goals.

We have reviewed the Draft Environmental Impact Statement (DEIS) and Initial Route Proposal (IRP) for the SW Corridor project, and respectfully offer the following comments.

We generally agree that the IRP meets the project purpose but have significant reservations about elements of the DEIS. While the Southwest Corridor is evaluated as a transportation project, we believe it is fundamentally a tool to shape and manage growth. The PSC was deeply involved in laying the groundwork for this project through our consideration of the Barbur Concept Plan (BCP), adopted by the City in 2013. The IRP in part honors that plan, which emphasized the land use, growth management, and place-making opportunities that should drive the project alignment.



City of Portland, Oregon | Bureau of Planning and Sustainability | www.portlandoregon.gov/bps
1900 SW 4th Avenue, Suite 7100, Portland, OR 97201 | phone: 503-823-7700 | fax: 503-823-7800 | tty: 503-823-6868

Printed on 100% post-consumer waste recycled paper.

We appreciate these project elements:

- The through-route alignment serving downtown Tigard.
- Shuttle service and strong pedestrian and bike connections to the PCC Sylvania campus.
- The in-Barbur alignment north of the Crossroads.
- The shared transitway to facilitate more reliable bus service in Southwest Portland.
- The inclusion of important pedestrian and bike improvements for station access.
- A strong connection to Marquam Hill.

Environmental Justice Concerns

Social justice and equity are at the core of the Commission's Comprehensive Planning and Climate Action Plan roles. With this context in mind, we are disappointed in the DEIS Environmental Justice analysis, and the lack of attention to housing stability in the indirect and cumulative effects analysis. Given the resources that the cities of Tigard and Portland have put into studying housing needs in the corridor, and the potential for displacement, the DEIS analysis of this topic is insufficient and superficial. As written, the analysis is narrowly focused on direct displacement. This analysis needs to be broadened to consider displacement caused by the expected real estate activity and property value changes that will come because of a major light rail investment. Although light rail is not the sole cause of gentrification and displacement, it is well established that major light rail investment will impact property values and rents in a corridor, and therefore, it is an impact that must be analyzed and mitigated.

Past transit investments in Portland have contributed to the displacement of low-income households and communities of color. Therefore, we have recommended the Portland City Council plan for housing and transit together. Given that history, we are especially concerned with displacement pressure from rising housing costs and the impact of that pressure on immigrants and communities of color now living in apartments in West Portland near the Barbur Transit Center, and near Downtown Tigard. Residential displacement could also negatively impact important community institutions, such as the Islamic Center of Portland.

Through the Southwest Corridor Equitable Housing Strategy (SWEHS) the cities of Portland and Tigard have quantified the number of residents vulnerable to displacement pressures and the number of unregulated but still affordable housing units that could be susceptible to rent increases in the corridor. The SWEHS also includes information about where those risks overlap with communities of color. The data collected by Tigard and Portland should be further analyzed and the final EIS should evaluate appropriate mitigation actions that can be incorporated into the project, many of which have already been identified in the SWEHS.

It is essential that the transit project and the housing strategy are funded and implemented in tandem. One cannot be done without the other. We appreciate that TriMet has engaged with other project partners to discuss a Memorandum of Understanding to dedicate and discount TriMet-owned land to support the feasibility of affordable housing development. The project will be stronger with a robust support of the housing strategy because ridership will decline if core riders are displaced and cannot access the benefits of low-cost transit service or new services and amenities that come with the development of the corridor.

Transportation Concerns

In addition, we are concerned about the scope of transportation impact analysis in the DEIS. While we appreciate that the analysis addresses active transportation, the framework of the technical study is extremely vehicle-centered. This approach is contrary to the adopted policies in Portland's Transportation



City of Portland, Oregon | Bureau of Planning and Sustainability | www.portlandoregon.gov/bps
1900 SW 4th Avenue, Suite 7100, Portland, OR 97201 | phone: 503-823-7700 | fax: 503-823-7800 | tty: 503-823-6868

Printed on 100% post-consumer waste recycled paper.

System Plan (TSP). Portland's TSP prioritizes modes of people movement in the following order: walking, bicycling, transit, taxi/commercial transit/shared vehicles, zero emission vehicles; and other single occupancy vehicles at the lowest priority.

Most mitigations itemized in the DEIS are aimed at maintaining vehicle movement rather than people movement. While it is helpful that the DEIS identifies the potential impact of vehicle-related mitigation on active transportation modes (Table 3.3-1 for example), the emphasis is on maintaining or expanding vehicle roadway capacity. This is backwards. The transportation analysis should be about how people move through the corridor. The mitigation list should include actions that better manage demand, more efficiently allocate the existing road capacity, or encourage other modes.

One specific active transportation concern is how the project could disrupt or improve bicycle network connectivity in the corridor. The project will be more successful if there is a complete network of active transportation options throughout the corridor. The project has an opportunity to think more broadly about how to make all alternatives to driving safer and more convenient. In particular, the alignment options at the West Portland crossroads, and at the historic viaducts need to be evaluated with this lens. More public discussion is needed in both locations.

A related concern is the location and size of park and ride lots in places where local land use plans emphasize pedestrian access and walkability. We urge you to look carefully at the relationship between park and rides and planned land uses. In the West Portland Town Center, the vehicle traffic generated by the Barbur Transit Center park and ride facility undermines the land use vision for a Town Center – that it become a walkable human-scale community.

Finally, we would like to note our strong support for reconfiguring the Ross Island Bridgehead to re-establish an urban street pattern. That project facilitates significant redevelopment close to the Gibbs station, which supports transit ridership and regional growth management goals. As described in the DEIS, the Bridgehead reconstruction also improves traffic outcomes at this regionally-significant bottleneck. We do not support reconstruction of the Bridgehead as a limited access facility – that alternative is directly at odds with thirty years of land use plans for that area.

We the opportunity to comment on the DEIS and IRP for the SW Corridor project. As stewards of the Portland Comprehensive Plan and Climate Action Plan, we will remain engaged as planning progresses, and as designs are refined.

Sincerely,



Katherine Schultz
Chair

