

Prepared by the Federal Transit Administration and Metro, in cooperation with TriMet and the City of Portland







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Federal Transit Administration

FINDING OF NO SIGNIFICANT IMPACT (FONSI)

for the Portland Streetcar Loop Project

Portland, Oregon

Issued Pursuant to 42 U.S.C. 4332 (2)(c) and 23 U.S.C. 128 (a)

In January 2008, the Federal Transit Administration (FTA) authorized publication of the Environmental Assessment on the Portland Streetcar Loop Project (EA). The project would extend the existing Portland Streetcar to the east side of the Portland Central City, an extension of 3.3 miles of double track rails, and add 18 station pairs.

On February 7, 2008, local project sponsor Metro, on behalf of itself and co-sponsors the City of Portland and the Tri-County Metropolitan Transportation District (TriMet), published an advertisement of the availability of the EA and of the public comment period in the *Oregonian* newspaper. On February 8, 2008, Metro sent to over 200 recipients, including Federal and state agencies, an e-mail announcing the EA and comment period and issued a press release regarding the EA. On February 21, 2008, Metro mailed to 2,041 addressees a postcard publicizing a March 6, 2008, open house on the project. On February 29, 2008, Metro issued to 4,716 recipients an edition of its planning e-newsletter calling attention to the EA and comment period. The EA was available for review at Metro's offices, at the March 6, 2008, open house, and to be read and downloaded at the Metro website.

Appendix A contains revisions to the EA made in response to comments. Appendix B contains all comments and responses to them. Appendix C contains the project commitment list and Appendix D the circulation list.

In accordance with National Environmental Policy Act of 1969 (42 U.S.C 4332 et seq.), as amended, and 23 CFR 771.121, the FTA has determined that the proposed Portland Streetcar Loop Project, as defined in the EA, will have no significant adverse impacts on the environment. This FONSI is based on the EA dated January 2008, which is incorporated by reference, along with other documents and attachments, as itemized in the EA and in this FONSI, along with the findings herein. The FTA has independently evaluated the EA and determined that it adequately discusses the Portland Streetcar Loop Project purpose and need, environmental issues, impacts of the proposed action and appropriate mitigation measures as may be required. The EA has provided sufficient evidence and analysis for determining that an environmental impact statement is not required.

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7/2/08

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Portland Streetcar Loop Project June 2008 Finding of No Significant Impact (FONSI) and Other Determinations of Environmental Compliance

1. INTRODUCTION

This document provides the determination of the Finding of No Significant Impact (FONSI) and other determinations of environmental compliance for the Portland Streetcar Loop Project in Portland, Oregon. These determinations are in accordance with the National Environmental Policy Act of 1969 (NEPA) (42 U.S.C 4332 et seq.), as amended. Appendix A, Errata, Revisions, and Additional Information, includes modifications to the January 2008 Portland Streetcar Loop Environmental Assessment (EA) in response to comments on it. It contains corrections to several typographical grammatical errors, but there are no revisions to the EA and no additional information. Appendix B, Comments on the Environmental Assessment and Responses, includes all comments on the EA submitted and responses to them. Appendix C, Project Design and Mitigation Commitments, contains commitments that are part of the project design as described in the EA and mitigation measures to which the EA commits to be completed. Appendix D, Distribution List, lists all parties to whom notification of the availability of the EA was sent.

2. DESCRIPTION OF THE PROPOSED PROJECT

The full description of the project in the EA is incorporated into this FONSI by reference. The purpose of the Portland Streetcar Loop Project is to provide a Central City transit circulator to address the transportation needs of the residents, workers and visitors traveling within the Portland Central City and achieve additional economic development, all in a way that gains strong public support. The need for the Portland Streetcar Loop Project arises from:

- Historic and rapid population and employment growth in the Portland Central City.
- High levels of existing traffic congestion and travel delay within the Portland Central City and deteriorating travel conditions in the future due to projected population and employment growth, made worse by a limited ability to increase the capacity of the existing bridges that connect the east and west sides of the Central City.
- The lack of high-quality transit circulator service throughout the entire Portland Central City to facilitate travel within the Central City as an alternative to circulation by automobile.
- The need for improved transit services and facilities to support important regional and local land use and development goals and objectives.

The Portland Central City is projected to accommodate significant amounts of employment and household growth in the next 20 years. The urban growth boundary, required by the Oregon Statewide Planning Program to protect farm and forest lands, demands a compact urban form. The location of new growth strongly affects the region's and the Central City's transportation planning efforts, because household growth in the Portland Central City tends to generate fewer automobile trips, fewer vehicle miles traveled, and more transit and walks trips, compared to similar household growth in other areas of the region. These travel characteristics of the Portland Central City are important because they allow the region to meet its adopted goals for multi-modal transportation, compact mixed use development, clean air, efficient use of energy, reductions in vehicle miles of travel, and conservation of environmental resources, such as farmland, forest land and natural areas.

The Willamette River naturally constrains travel to, from, and between the Central City districts. It has helped shape the development of regional transportation facilities within the Central City, including the arterial street and bridge network; the interstate system; and the major transit facilities.

Six arterial bridges span the river, linking the Westside and Eastside of the Central City. While existing travel demand has operationally strained these bridges, the 20-year financially constrained transportation system does not include any increases in vehicular capacity on the bridges. Adding a streetcar provides additional capacity to move more people within the Central City and connect to transit serving areas beyond the Central City as compared with the current bus service.

The project would construct 3.3 miles of double track rail lines in existing streets and public rightof-way from NW 10th Avenue and Lovejoy Street in the Pearl District of northwest Portland to the Oregon Museum of Science and Industry (OMSI) in southeast Portland. The line would use the Broadway Bridge to cross the Willamette River, to connect with the Lloyd District on Broadway and Weidler streets and then go south along Martin Luther King Jr. Boulevard and Grand Avenue through the Central Eastside Industrial District, ending at OMSI. This alignment would include 18 new station pairs with designs similar to those along the existing Portland Streetcar alignment. Though not included in this project, another phase to the project would complete the loop of the Portland Central City could be built and operated.

Other features of the project are:

- Locating the new streetcar tracks within current street right-of-way and within existing general purpose traffic lanes, except in a few locations where the streetcar would either require small amounts of new right-of-way or where the streetcar would operate in an exclusive streetcar-only lane. Along NW Lovejoy Street, N/NE Broadway, and N/NE Weidler the streetcar tracks would generally be located within the left-most general purpose travel lane of a two-way street. In most other locations, the new streetcar tracks would generally be located in the right-most or left-most general purpose travel lane of a one-way street.
- Adding 10 streetcars. The design, capacity and operating characteristics of the additional streetcars would be similar to the City's existing fleet of streetcars.
- Expansion of the existing streetcar operations and maintenance facility from 30,000 square feet to about 50,000 square feet.
- Making roadway improvements, including structural improvements to the existing Broadway Bridge (a general purpose roadway); new traffic signals, and some new phases to existing signals; streetcar-only lanes; lane changes, including striping; the movement and/or displacement of existing on-street parking; and the modification of existing freight loading zones; and bicycle and pedestrian improvements.
- Eliminating Bus Line 6, MLK Boulevard, service south of Multnomah Street (replaced by streetcar service) and making several improvements to bus stops for connecting bus lines to provide better connections to the Portland Streetcar Loop Project.
- Limiting Bus Line 83 operation to between the streetcar's OMSI Station and the RiverPlace Station, crossing the Willamette River via the Hawthorne Bridge.
- By 2025, operating the Portland Streetcar Loop with 10-minute headways during weekday peak periods and with 15-minute headways during other times of service.

3. PROJECT DEVELOPMENT AND PUBLIC AND AGENCY REVIEW

Metro, TriMet and the City of Portland developed the project in the stages described below:

Technical Analysis – April 2005 to March 2006. The technical analysis focused on addressing the project's goal, objectives, evaluation criteria and measures and related environmental issues and considerations.

Approval of Evaluation Report – **March to April 2006.** The project's Steering Committee reviewed the draft Evaluation Report and approved it in April 2006, finding that: 1) the report included data of sufficient quality and breadth for local decision-making; 2) that the cost effectiveness of the proposed project alternatives was reasonable; and, 3) that the Evaluation Report was ready for public review.

Recommendation Formulation – May 2006. Project sponsors made the Evaluation Report available for public comment period from May 2 to June 30, 2006, and held an open house on May 3, 2006. On May 10, 2006, the Eastside Project Advisory Committee held a public hearing in downtown Portland. Other public outreach activities included the production of fact sheets, presentations to a variety of groups, articles in Metro Councilor newsletters, postcards mailed to business property owners, a media advisory, and an advertisement in *The Oregonian*.

Adoption of the Locally Preferred Alternative (LPA) – June to July 2006. The adoption process for the project's LPA included recommendations from the City of Portland, TriMet, Multnomah County, the Oregon Department of Transportation, and Metro. Metro's Joint Policy Advisory Committee on Transportation approved a resolution supporting the proposed LPA and Metro Council approved the LPA on July 25, 2006.

Environmental Assessment – On December 21, 2006, Metro requested approval from FTA to initiate an EA for the Portland Streetcar Loop Project. On January 29, 2007, Metro, TriMet and the City of Portland held a scoping open house.

Public Review of Environmental Assessment – FTA published the EA on January 31, 2008, and, on February 7, 2008, Metro published an advertisement of the availability of the EA and of the public comment period in the *Oregonian* newspaper. On February 8, 2008, Metro sent to over 200 recipients, including Federal and state agencies, an e-mail announcing availability of the EA and comment period and issued a press release regarding the EA. On February 21, 2008, Metro mailed to 2,041 addressees a postcard publicizing a March 6, 2008, open house on the project. On February 29, 2008, Metro issued to 4,716 recipients an edition of its planning e-newsletter calling attention to the EA and comment period. Metro held the public open house on March 6, 2008. The next section addresses the comments received.

4. COMMENTS ON THE ENVIRONMENTAL ASSESSMENT

The project team received a small number of comments. The Oregon Department of Transportation's regional office and the Lloyd Transportation Management Association's Bicycle Committee sent letters. A representative of the Association of Oregon Rail and Transit Advocates submitted written comments at the March 8, 2008, open house and later submitted written comments on his own

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behalf. Eight other citizens submitted written comments. Appendix B contains all of these written comments and responses to them. No oral comments at the open house were recorded.

5. MITIGATION MEASURES TO MINIMIZE HARM

Appendix C, Project Design and Mitigation Commitments, contains the description of the project addressed in the EA and design features and mitigation measures project sponsors committed to in the EA.

6. DETERMINATIONS OF ENVIRONMENTAL COMPLIANCE

6.1 National Environmental Policy Act Finding

The FTA is the federal lead agency on this project. Metro is the lead project sponsor; the City of Portland and TriMet are co-sponsors with Metro. Metro prepared the EA in compliance with NEPA. The FTA independently evaluated the EA, which analyzes potential impacts of the project, to determine whether the project would have significant adverse environmental impacts. If the project would have significant adverse impacts, an environmental impact statement would have to be prepared. The EA found that the project's construction and operation would not cause any significant adverse environmental impacts. This applies to all categories of impacts, including:

Transit service Vehicular traffic Parking Bicycle and pedestrian facilities and safety Truck freight Interurban freight and passenger rail Land use Economic development Property acquisition Neighborhoods and communities, and environmental justice Noise and vibration Air quality Visual and aesthetic resources Utilities and energy Historic, archaeological and cultural resources Archaeological resources Parklands and recreation areas Hazardous materials Geology and earthquake safety Biological resources and endangered species Water quality and hydrology Construction activities and consequences Cumulative environmental consequences

After carefully considering the EA, its supporting technical documents, and the comments on the EA and the responses to the comments, FTA finds under 23 CFR 771.121 that the construction and

Portland Streetcar Loop Project June 2008 Finding of No Significant Impact (FONSI) and Other Determinations of Environmental Compliance operation of the Portland Streetcar Loop Project, with the mitigation measures for which TriMet is committed, will have no significant adverse impacts on the environment. The record provides sufficient evidence and analysis for determining that an environmental impact statement is not required.

6.2 Section 106 Compliance

The federal government enacted National Historic Preservation Act of 1966, as amended, to preserve the nation's historic resources. The Act established the National Register of Historic Places (NRHP), which lists historic sites, including districts, sites, buildings, and objects designated for preservation. Section 106 of the Act requires federal agencies to take eligible or listed NRHP sites into account in their actions. Federal agencies must coordinate with the State Historic Preservation Officer (SHPO) and potentially affected tribes. The Advisory Council on Historic Preservation established procedures for the protection of historic and cultural properties in, or eligible for, the NRHP (36 CFR Part 800).

In December 2006, FTA invited potentially-interested native American tribes to participate in the project's scoping, which occurred in January 2007. Metro sent the scoping notification and invitation to participate to the Columbia Inter-Tribal Fish Commission and the Confederated Tribes of the Grand Ronde, Confederated Tribes of the Warm Springs, and Confederated Tribes of Siletz. None of the contacted tribes or the commission participated in or made comment during scoping or during the preparation of the EA or public comment period for the EA.

Project staff conducted and documented its evaluation of historic resources in compliance with Section 106 of the National Historic Preservation Act. In consultation with the Oregon SHPO, project staff identified 43 historic resources in the area of potential effect (APE). Of those 43 resources, 23 resources are listed on the NRHP and 11 buildings are listed on the Portland Landmarks Register. Twenty of the resources are not on either list, but project staff, FTA, and the Oregon SHPO determined that they are likely eligible for listing on the NRHP. Level of Effect forms completed for each historic resource document that the project would adversely affect no historic resources. No property associated with any of the historic resources would be acquired and, while the proposed streetcar tracks and associated improvements would be installed and streetcars would operate within the vicinity of the historic resources, much of the area in the vicinity of these resources was developed during the early part of the twentieth century, and trolleys existed on most of the streets on which the proposed Streetcar Loop Project would be located.

A survey of existing archaeological documentation identified no archaeological resources within the APE. However, given the long history of development of the project area, intact archaeological deposits may be present within the APE. Because of the presence of structures and paved surfaces and the lack of exposed soils, locations of potential buried deposits cannot be easily identified or investigated. At the same time, construction of the project would require little subsurface disturbance. Rails would be placed within existing roadways and no disturbances would occur below the existing roadway bed, except for areas where utility work would occur and for structural features of the railroad over-crossing near OMSI. Consequently, it is unlikely that any buried deposits would be identified, exposed or adversely affected by construction. However, if archaeological materials were encountered during construction, all construction activity in the vicinity of the find would cease

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until project sponsors could contact appropriate state, federal and/or tribal officials, evaluate the nature and significance of the discovery, and identify an appropriate course of action. If an archaeological find was determined to be significant, mitigation through avoidance or data recovery may be necessary.

Based on the archaeological and historic resources analysis included in the January 2008 EA and coordination with the Oregon SHPO, FTA finds that the project will have no adverse effect on any identified or likely historic or archaeological resources and that the Section 106 consultation requirements for this project have been fulfilled.

6.3 Section 4(f) Findings

The U.S. Department of Transportation requires an evaluation of the use of land protected under Section 4(f) of the U.S. Department of Transportation Act of 1966. This includes publicly-owned parks, recreation areas, wildlife and waterfowl refuges, and historic resources. The project would make no use of parks, recreation areas, or wildlife and waterfowl refuges. The sole Section 4(f) issue is the proposed use of the Broadway Bridge, which is a listed NRHP resource. Proposed changes to the bridge include: 1) installation of streetcar rails in the existing deck; 2) installation of an overhead catenary system to provide electricity and support communications, safety and signaling devices; 3) installation of locks to connect the two lift spans while in the down position (for added structural strength); and 4) replacement of the existing sidewalk on the two lift spans with sidewalks of similar design, but made of lighter-weight materials. Streetcars would operate in both directions across the bridge. These improvements would not adversely affect the historic integrity of the bridge because the Broadway Bridge originally included streetcar, the proposed improvements would be designed to be consistent with the bridge's visual and structural design, and the improvements would be designed so that operating the streetcar across the bridge would not result in any structural damage to the bridge. As documented in the Level of Effect form, there would be no adverse effect to the Broadway Bridge and, consequently, the Section 4(f) impact would be *de minimis*.

FTA finds that the proposed project will not use or significantly affect any parks, recreation areas, or wildlife and waterfowl refuges protected by Section 4(f) of the USDOT Act of 1966. FTA finds that the proposed project will not use or significantly adversely affect any historic resources protected by Section 4(f) of the U.S. Department of Transportation Act of 1966.

6.4 Endangered Species Act Findings

The federal Endangered Species Act, as amended (16 USC 1531-1544) (ESA), prohibits the incidental take of any federally-listed species. Take includes harass and harm. Harm includes killing or injuring federally-listed species, including acts that may modify or degrade habitat in a way that impairs essential behavioral patterns of the species. Under Section 7 of the ESA, any federal agency that permits, funds, carries out, or otherwise authorizes an action is required to ensure that the action will not jeopardize the continued existence of listed species or result in the destruction or adverse modification of designated critical habitat. If there is a potential for the project to affect any federally-listed species or its critical habitat, then an agency is required to consult with the National Marine Fisheries Service for aquatic species or U.S. Fish and Wildlife Service for terrestrial species.

Steelhead, Chinook, and coho salmon are aquatic species listed under the ESA for which the Willamette River in the project area is designated critical habitat. With implementation of the conservation measures and best management practices listed in the EA, FTA finds that the project would have "no effect" on aquatic species listed as threatened or endangered under the ESA or their designated critical habitat. This is because project activities would: 1) be conducted entirely within the developed transportation system right-of-way, 2) not remove or modify vegetation in any way, 3) not alter existing hydrology through modified discharges, and 4) not discharge materials (such as water, asphalt, grindings, or fill material, including construction debris from construction or bridge upgrade activities) into the Willamette River and 5) not require in-water work. Therefore, no consultation with the National Marine Fisheries Service is required.

On February 11, 2008, after the publication of the EA, the National Marine Fisheries Service issued a final determination to list the Oregon Coast coho salmon (*Oncorhynchus kisutch*) evolutionarily significant unit (ESU) as a threatened species under the ESA. A review of the Oregon Coast coho salmon ESU, the designated critical habitat for it, and their relationship to the project area concluded that no critical habitat is within the project area and Oregon Coast coho salmon are not expected to be present in the Willamette River. The project team requested from the U.S. Fish and Wildlife Service an updated list of species on or proposed for the list of endangered and threatened species under the ESA that may occur in Multnomah County, where the project is located. However, the U.S. Fish and Wildlife Service stated that the Multnomah County list is unchanged because Oregon Coast coho salmon do not occur in the County. Therefore, the project would have "no effect" on Oregon Coast coho salmon and no consultation with the National Marine Fisheries Service is required.

The only terrestrial species listed as threatened or endangered that is likely to exist in the action area is the water howellia. FTA finds that, because the area has little suitable habitat for terrestrial species, and none for water howellia, the project would not affect this species and no consultation with the U.S. Fish and Wildlife Service is required.

6.5 Magnuson-Stevens Act Finding

The Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act) mandates that Federal agencies must consult with the National Marine Fisheries Service on all actions that may adversely affect essential fish habitat (EFH). While the Willamette River in the Portland area constitutes EFH for salmon, FTA concludes that, with implementation of the conservation measures and best management practices listed in the EA, the project will have "no effect" under the Magnuson-Stevens Act. The reasons are the same as those supporting the determination that the project will have no effect on aquatic species listed under the ESA, i.e., that it will not: 1) be conducted entirely within the developed transportation system right-of-way, 2) not remove or modify vegetation in any way, 3) not alter existing hydrology through modified discharges, and 4) not discharge materials (such as water, asphalt, grindings, or fill material, including construction debris from construction or bridge upgrade activities) into the Willamette River and 5) not require in-water work.

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6.6 Conformity with Air Quality Plans

Under the 1990 federal Clean Air Act Amendments, no federal agency may support, license, permit, or approve any activity that does not conform to the State Implementation Plan (SIP) (42 U.S.C Sec. 7506(c)). Federal agencies are required to make a conformity determination under the transportation conformity regulations promulgated by EPA (42 CFR §93.100 to §93.1 23). The Portland Streetcar Loop Project is included in the 2035 Regional Transportation Plan, which will be implemented through the 2008-11 Metropolitan Transportation Improvement Program (MTIP). Metro has performed a regional scale Air Quality Conformity Determination for the 2035 RTP and 2008-11 MTIP which includes the Portland Streetcar Loop and the USDOT has approved, after consultation with the EPA, that the region wide system meets air quality standards. In addition, the local scale "hot spot" air quality analysis in the EA concludes that the project would not cause or contribute to any violation of the National Ambient Air Quality Standard for carbon monoxide at or near the most heavily used intersections affected by the Project. Therefore, FTA determines that the project would conform to the Oregon SIP.

6.7 Farmland Findings

Neither suitable soils nor active farming occur on lands that would be used for the project. The project would be consistent with the Farmlands Protection Policy Act of 1981 (7 U.S.C. 4201-4209) and other applicable state and federal farmland protection policies, orders, and guidance. FTA finds that there would be no adverse impacts to agricultural lands caused by the proposed project.

6.7 Environmental Justice Findings

Executive Order 12898 provides that "each federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority and low-income populations." To implement this order, the Department of Transportation requires FTA to explicitly consider human health and environmental effects related to transit projects that may have a disproportionately high and adverse effect on minority and low-income populations. It also requires them to implement procedures to provide "meaningful opportunities for public involvement" by members of these populations during project planning and development (DOT Order No. 5680.1).

The project would not have high and disproportionate adverse impacts on low-income or minority populations. All six of the census tracts in the project study area had higher percentages of residents with household income below the poverty level in 1999 compared to the region and two census tracts had higher percentages of minority residents than the region in 2000. However, the project would not have high adverse impacts at all and therefore would not have high and disproportionate adverse impacts on low-income or minority populations. The project would improve transit service to all residents of the study area, including low-income and minority populations.

The Streetcar Loop project's outreach to low-income and minority populations within the project study area was part of the project's overall public involvement program. Specific elements of the outreach program that included members of low-income and minority populations included

presentations to neighborhood groups; distribution of project notifications and summary documents to the project's mail and email distribution list; media advisories; providing public meetings in accessible buildings within the project study area; allowing public comment before the adopting body for the participating jurisdictions (e.g., Portland City Council); and accepting public comment via mail-back cards and phone messaging.

Appendix A ERRATA, REVISIONS, OTHER INFORMATION

Errata

Page S-4, last paragraph. Add comma after "e.g." and change "advertizing" to "advertising."

Page 3-6, first paragraph, first and second lines, change "affect" to "effect."

Page 3-7, last paragraph, change "Union Pacific" to "UP" and "Oregon Pacific Railroad" to "OP."

Page 3-40, second paragraph, change "affect" to "effect."

Page 3-43, third paragraph, line 7, drop comma after "Project's."

Revisions

None.

Other Information

None.

Commenter Name, Affiliation	Com- ment No.	Capsule Summary (see complete comment)	Response
Jason Tell, Region 1, Oregon Department of Transportation	1	The streetcar's effect on traffic at the I- 5/Broadway/Weidler Interchange is a concern and project sponsors need to work with ODOT to resolve the concern.	Project sponsors have already begun working with ODOT to avoid interfering with compliance with state standards on ODOT facilities, especially the I-5/Broadway/Weidler Interchange, and will continue to do so through preliminary engineering and final design. ODOT has clarified that its concern was over streetcar traffic signal preemption at intersections at the interchange ramp ends. Project sponsors have clarified to ODOT that the streetcar would not have signal preemption at these intersections.
Jim Howell, AORTA	1	Streetcars should be operated on the transit mall downtown.	The transportation purpose of the Portland Streetcar Loop Project is to "provide a Central City transit circulator to address the transportation needs of the residents, workers and visitors traveling within the Portland Central City" It would provide the northern crossing of the Willamette River and the east side component, creating, in conjunction with light rail on the downtown Portland transit mall, a full loop, except for the southern crossing of the River. The project would not preclude operating streetcars on the transit mall downtown in the future.
	2	The South Corridor light rail line should be routed on the east side of the Willamette River.	The comment addresses a project different from the proposed project. Future studies may address light rail on the east side of the Willamette River.
	3	on the east side of the Willamette River would provide fast, direct service.	Comment #3 would not meet the project purpose and need. It would not provide for a Central City circulator. [In addition to the project's purpose and need the 1988 Portland Central City Plan called for "Plan and construct an inner city transit loop (possibly on Grand Ave.)" Further, the 1995 Portland Central City Transportation Management Plan stated thed desire to develop a Central City streetcar circulator). Furthermore, the comment raises alignment issues related to the current South Corridor
	4	Streetcars instead of the South Corridor light rail project should serve the South Waterfront area.	The existing streetcar system does serve the South Waterfront area. This comment also addresses the current South Corridor DEIS Project.

Commenter Name, Affiliation		Capsule Summary (see complete comment)	Response
	5	The Eastside Streetcar Loop should cross the Willamette River on the Hawthorne Bridge.	Previous studies (South Corridor SDEIS 2004) evaluated using the Hawthorne Bridge for fixed rail systems. The relatively low clearance of the Hawthorne Bridge requires more frequent lifts for river traffic than the other Willamette Bridges. These more frequent lifts could have impacts to providing reliable transit service. The proposed project anticipates a future southern crossing of the Willamette River that would be constructed as a part of the South Corridor Phase 2 project. The Streetcar Central City Loop would use the yet-to-be determined crossing route that is expected to result from the Milwaukie LBT Project. See p. 2-3 of the EA last paragraph.
Terry Parker	1	The primary purpose of streetcars is to subsidize private land development.	The Portland Eastside Loop Project, like most transit projects, has multiple objectives, including improving Portland Central City transit access and circulation, supporting existing and future transit investments that serve the Portland Central City, supporting economic development in the Portland Central City, and reducing reliance on single-occupancy vehicle trips to and within the Portland Central City. Because it will serve the Central City, many people in Portland would benefit from it.
	2	Financial gain by members of the board of directors of Portland Streetcar, Inc., and project advisory committee members should raise red flags.	Unlike previous Portland streetcar projects, TriMet would be the grantee of Federal funds for this project, not Portland Streetcar, Inc. The project would be a public infrastructure investment benefiting the community as a whole, which includes many property and business owners and residents. Partial capital funding would come from a local improvement district paid for by owners of properties located adjacent to or near the project route, and sponsorships would provide partial funding of operating costs. Consequently, participation in project development by property owners is both necessary and appropriate. Project development documents have listed advisory committee members and the members of the board of directors of Portland Streetcar, Inc., are listed on its web site, providing full disclosure. The Metro Council gave final approval of the Locally Preferred Alternative; it is made up exclusively of elected officials who have no personal financial stake in properties in the project area. 49 CFR § 18.36(b)(3), which would apply to TriMet as grantee, states, among other requirements, "No employee, officer or agent of the grantee or sub-grantee shall participate in selection, or in the award or administration of a contract supported by Federal funds if a conflict of interest, real or apparent, would be involved."

Commenter Name,	Com- ment No.		Response
	3		Traffic analysis for the proposed Portland Streetcar Loop Project has been done and indicates that the streetcar route would not significantly impact traffic along the route. In general the streetcar would move with traffic, with on-street stops affecting traffic similar to a TriMet bus. The alignment of the Portland Streetcar Loop would use the right-hand lane on Grand Avenue and MLK Boulevard, which would minimize any potential impacts on truck operations. Trucks on Grand Avenue are generally in the left hand lanes to access I-5 and the Willamette River bridges. Trucks from I-5 destined to the Brooklyn rail yard generally merge onto MLK Boulevard in the left-hand lane and generally do not transition into the right-hand lane until they are near or beyond the south end of the streetcar tracks. The Broadway bridge is generally less congested than some other Willamette River bridges. The Portland Streetcar Loop would provide another option for people to cross the Willamette River without using their cars. It is true that the streetcar being a track-based vehicle has less flexibility to change routes. However, the Portland Streetcar Loop is within an urbanized inner-city area that is largely urban in nature and, therefore, traffic patterns are unlikely to change significantly from those of today.
	4		The alternatives analysis seriously considered, but rejected, use of 6th Avenue because "the zoning east of 6th Avenue is industrial sanctuary which limits the redevelopment potential of the area. The greater redevelopment opportunities, zoning, and existing fabric were influential in recommending the MLK/Grand corridor." See City of Portland, Eastside Streetcar Alignment Study, June 23, 2003, p. 9.
	5	continuing public subsidies.	While the comment is correct that the project will require ongoing operating cost subsidies, all modes of transportation require subsidies. Higher transit ridership reduces the need for new street and highway facilities, yielding high cost savings. Expected increases in the cost of gasoline may increase ridership and future fare amounts are subject to adjustment, possibly reducing the amount of needed subsidies.

Commenter Name, Affiliation		Capsule Summary (see complete comment)	Response
	6	The Portland Streetcar Loop should be able to stand on its own.	The project is intended to improve the operation of the transit system as a whole, not to operate independently of the rest of the transit system. Achieving the benefits for the transit system as a whole requires adjusting other components of the system as each new major transit facility opens for operations. In this case some buses will be rerouted. Transfers are a common and necessary feature of a comprehensive transit system.
	7	In light of the previous points, the Portland Streetcar Loop is not "an efficient transportation option for the region."	This comment summarizes the commenter's previous comments. In addition to the responses to those comments, above, the project provides an alternative means of transportation in an area that will experience increasing congestion over time.

Commenter Name,		Capsule Summary (see complete	
Affiliation Allie Medeiros Kathy Rakers	<u>No.</u> 1	comment) The Portland Streetcar Loop would worsen congestion.	Response Simulation modeling of the proposed Portland Streetcar Loop indicates that the streetcar route would not significantly impact the traffic congestion along the route. In general the streetcar will move with traffic with on-street stops producing traffic impacts similar to a TriMet bus. There are ten locations where a streetcar-only traffic signal phasing is proposed. Only seven of those intersections require all other movements to stop. Four of those seven require only approximately five seconds to give the streetcar a space to merge into the through lane ahead of the general traffic. This would be similar to the amount of delay a vehicle would incur when it allows a bus to merge into traffic from a bus pull-out at the beginning of a green light. At three locations where longer delays are required to allow the streetcar to turn across travel lanes, the simulations indicate that the increased delay from the streetcar-only phase would dissipate within one to three cycle lengths. The streetcar-only phase would be used only when the streetcar is present, which would be approximately every 11 to 15 minutes. There are no existing travel lanes that are proposed for conversion to transit-only lanes. The transit only lanes proposed in the plan are created by using space currently designated for other uses, including parking lanes, shoulders, medians and, in limited cases, portions of extra-wide sidewalk. Providing a high quality transit mode on the proposed alignment will likely encourage some drivers to leave their cars at home and take the streetcar, freeing up some roadway capacity for other users.

Commenter Name, Affiliation		Capsule Summary (see complete comment)	Response
	2	The traffic analysis does not include projections of opening year volumes.	There are ten locations where a streetcar-only traffic signal phasing is proposed. Only seven of those intersections require all other movements to stop. Four of those seven require only approximately five seconds to give the streetcar a space to merge into the through lane ahead of the general traffic. This would be similar to the amount of delay a vehicle would incur when it allows a bus to merge into traffic from a bus pull-out at the beginning of a green light. At three locations where longer delays are required to allow the streetcar to turn across travel lanes, the simulations indicate that the increased delay from the streetcar-only phase would dissipate within one to three cycle lengths. The streetcar-only phases would be used only when the streetcar is present, which would be approximately every 11 to 15 minutes.
	3	The traffic analysis does not evaluate added vehicle delay.	There are no existing travel lanes that are proposed for conversion to transit-only lanes. The transit only lanes proposed in the plan are created by using space currently designated for other uses, including parking lanes, shoulders, medians and, in limited cases, portions of extra-wide sidewalk.

	Com-		
Commenter Name,	ment	Capsule Summary (see complete	
Affiliation	No.	comment)	Response
	4	Streetcar service would be slowed by congestion.	It is true that the streetcar will be slowed by congestion because it generally travels with traffic. It is true that the streetcar will be slowed by congestion because it generally travels with traffic. However, the lanes used by the streetcar on its route were chosen to reduce the impact of congestion on the streetcar and limit the impact of streetcar operations on general traffic. The lane the streetcar would travel in is generally the lane with the lowest traffic volume and least amount of delay. Transit- only lanes have been added in some locations on MLK Boulevard to improve streetcar travel time without removing existing general travel lanes. Additional turning lanes have been added to improve general traffic flow at some locations. Limited streetcar signal priority is proposed to improve streetcar travel times. These design features would continue to be refined as the design process moves forward, with the goal of providing a reliable and efficient streetcar service that impacts traffic operations as little as practical. Simulation modeling does not indicate added delay on the Broadway/Weidler Couplet from the presence of a streetcar that would cause queuing onto I-5. The streetcar is purposefully not in the lanes used primarily by traffic entering or exiting I-5. It is true that those ramps, especially the northbound off-ramp to Weidler Street, occasionally queue onto I-5 today. During peak periods, MLK Boulevard and Grand Avenue are congested today and some drivers divert to other routes. Drivers on MLK Boulevard and Grand Avenue today are generally drivers who prefer that route and are willing to live with the congestion. Minor and temporary increases in delay on these already-congested streets, as the streetcar moves through a location, are unlikely to be enough to cause drivers to change their routes.
	5	The Portland Streetcar Loop isn't essential to spur redevelopment.	

Commenter Name, Affiliation		Capsule Summary (see complete comment)	Response
Sally Thomas	1	Turning the east side into another Pearl District should be avoided.	Simulation modeling does not indicate added delay on the Broadway/Weidler Couplet from the presence of a streetcar that would cause queuing onto I-5. The streetcar is purposefully not in the lanes used primarily by traffic entering or exiting I-5. It is true that those ramps, especially the northbound off-ramp to Weidler Street, occasionally queue onto I-5 today.
	2	Will funding for the project reduce funding for low-income housing.	
Jim Howell	1	The Portland Streetcar Loop adds little new transit service.	During peak periods, MLK Boulevard and Grand Avenue are congested today and some drivers divert to other routes. Drivers on MLK Boulevard and Grand Avenue today are generally drivers who prefer that route and are willing to live with the congestion. Minor and temporary increases in delay on these already-congested streets, as the streetcar moves through a location, are unlikely to be enough to cause drivers to change their routes.
	2	The Portland Streetcar Loop and No Build Alternative degrade existing bus service.	Implementation of any new fixed route transit service typically requires adjustments to the other transit service. Bus service in the area is typically adjusted to complement the newer fixed route service. In some cases the change in bus service could benefit some bus riders and reduce service to other riders. The reduction of bus service on MLK Boulevard and Grand Avenue is a tradeoff against the benefits that the Portland Streetcar Loop would provide, including higher capacity and the provision of a downtown transit circulator. Some riders would have reduced service, but many other riders would have improved service.
		The Portland Streetcar Loop should use the Steel Bridge instead of the Broadway Bridge.	The Broadway Bridge is the most direct connection between the Pearl and Lloyd Districts. It is also the best route to serve the Central City circulator function of the Streetcar Loop Project. Adding streetcar to the Steel Bridge would have the disadvantages of providing a less direct route, further concentrating fixed route transit on a single bridge, and improving transit where it already exists, rather than improving it on a different route.

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Commenter Name, Affiliation	Com- ment No.	Capsule Summary (see complete comment)	Response
	4	The Portland Streetcar Loop alignment should follow 7th Avenue.	Routing streetcars on 7th Avenue and Grand Avenues through the Lloyd District was selected as the preferred route because it would increase ridership compared to other routes that were evaluated, because it is closer to origins and destinations desired by riders. This deviation of the route from the MLK/Grand Couplet allows the transit service to extend further into the Lloyd District, where there is extensive high density and mixed use development that will generate higher ridership. Rails and overhead lines indicate to the public the streetcar route, helping to reduce confusion. The traffic analysis indicates that the project would not cause serious traffic problems on MLK Boulevard or Grand Avenue.
	5	The Portland Streetcar Loop should cross I-84 on a new bridge at 7th Avenue.	The alternatives analysis stated that "The proposed 7th Avenue Bridge is recommended to be implemented with or without streetcar crossing." See City of Portland, Eastside Streetcar Alignment Study, June 23, 2003, p. 8. The bridge is not part of the proposed project because 7th Avenue was rejected as a route in favor of MLK Boulevard and Grand Avenue.
	6	The added system ridership does not justify the cost of the Portland Streetcar Loop.	The purposes of the project are to provide a Central City transit circulator, support additional economic development, and add transit ridership to the system. The South Waterfront is served by the existing streetcar and will be served by the future Milwaukie LRT Project.
	7	The Portland Streetcar Loop should be connected to the South Waterfront area via the Hawthorne Bridge.	Previous studies (South Corridor SDEIS 2004) evaluated using the Hawthorne Bridge for fixed rail systems. The relatively low clearance of the Hawthorne Bridge requires more frequent lifts for river traffic than the other Willamette Bridges. These more frequent lifts could have impacts to providing reliable transit service. As a result, the proposed project does not include a southern crossing of the Willamette River using the Hawthorne Bridge. Instead it contemplates completing a Central City loop with a future and as yet undetermined river crossing route, that is expected to be determined by the Milwaukie LRT Project. See p. 2-3 of the EA, last paragraph. Some transfers are an unavoidable feature of any transit system. The predominant volume of expected transit trips from Milwaukie to downtown will not require a transfer. The purpose of the Streetcar Loop is in part to disseminate trips

Commenter Name, Affiliation		Capsule Summary (see complete comment)	Response
		The Portland Streetcar Loop should be routed differently in the vicinity of OMSI.	The alternatives analysis evaluated numerous routes, including some similar to the routing proposed in this comment. There are several important design constraints just east of OMSI. They include crossing of the Union Pacific Railroad (UPRR) and maintaining required clearance for the PGE electric transmission lines both vertically and horizontally. An at-grade crossing of the Streetcar alignment with UPRR would present safety and operational issues. To avoid these issues it was decided that the
Julia Banzi	1	There should be a light rail link to Oaks Amusement Park and the Sellwood district.	The South Corridor Phase 2 (or Milwaukie LRT) Project would provide a transportation connection between the Central City and the Sellwood area, among other locations. The Portland Streetcar Loop would link to the South Corridor light rail line at the south end of the proposed project. It would connect the Lloyd District and other tourist destinations to the future LRT project.
Jean Anderson Pezzi	1	"The loop would provide simple no- transfer access to the inner east side and provide the basis for later extensions."	Comment noted. The comment is consistent with the purpose of the proposed project.
Bev Anslow and Cicely Sullivan	1	The streetcar should run to Milwaukie, Gladstone, and Oregon City.	The South Corridor Phase 2 project is being planned to provide a high capacity transit connection between the Central City and Milwaukie.
David Johnson	1	The project should be phased.	Comment noted. The project staff evaluated several MOS options, and the project selected the full- length Project.
	2	Will there be a sign language interpreter at the March 6, 2008, open house?	Metro's public involvement coordinator attempted to contact the commenter to answer his questions about the workshop. Metro provided a sign language interpreter at the workshop, but the commenter did not attend.

, ,		Capsule Summary (see complete	
Affiliation	No.	comment)	Response
Bicycle Committee, Lloyd	1	The Portland Streetcar Loop may cause	Project sponsors have also consulted on these issues with representatives of the Bicycle Transportation
Transportation Management		bicycle accidents and result in conflicts	Alliance and bicycle staff of the Portland Office of Transportation and will continue to do so through
Association		among bicyclists, motor vehicles, and	preliminary engineering and project design. In particular, project sponsors will investigate placement
		streetcars.	of bike boxes at intersections with traffic signals along the alignment. A bike box is a green box painted on the street with a white bicycle symbol inside placed in front of the stop line for motor vehicles. Bicyclists are encouraged to wait in the box during red lights. The purpose is to help ensure that motorists see bicyclists when the light turns green, especially before making a right turn. The City of Portland has placed bike boxes at several locations in the City. For an illustration of a bike box, see http://www.portlandonline.com/transportation/index.cfm?c=46717&.

Commenter Name, Affiliation	Com- ment No.	Capsule Summary (see complete comment)	Response
Jason Tell, Region 1, Oregon Department of Transportation	1	The streetcar's effect on traffic at the I- 5/Broadway/Weidler Interchange is a concern and project sponsors need to work with ODOT to resolve the concern.	Project sponsors have already begun working with ODOT to avoid interfering with compliance with state standards on ODOT facilities, especially the I-5/Broadway/Weidler Interchange, and will continue to do so through preliminary engineering and final design. ODOT has clarified that its concern was over streetcar traffic signal preemption at intersections at the interchange ramp ends. Project sponsors have clarified to ODOT that the streetcar would not have signal preemption at these intersections.
Jim Howell, AORTA	1	Streetcars should be operated on the transit mall downtown.	The transportation purpose of the Portland Streetcar Loop Project is to "provide a Central City transit circulator to address the transportation needs of the residents, workers and visitors traveling within the Portland Central City" It would provide the northern crossing of the Willamette River and the east side component, creating, in conjunction with light rail on the downtown Portland transit mall, a full loop, except for the southern crossing of the River. The project would not preclude operating streetcars on the transit mall downtown in the future.
Jim Howell, AORTA	2	The South Corridor light rail line should be routed on the east side of the Willamette River.	The comment addresses a project different from the proposed project. Future studies may address light rail on the east side of the Willamette River.
Jim Howell, AORTA	3	Routing the South Corridor light rail line on the east side of the Willamette River would provide fast, direct service.	Routing the South Corridor light rail line on the east side of the Willamette River would not meet the project purpose and need. It would not provide for a Central City circulator. In addition to the project's purpose and need, the 1988 Portland Central City Plan called stated "Plan and construct an inner city transit loop (possibly on Grand Ave" and the 1995 Portland Central City Transportation Management Plan stated the desire to develop a Central City streetcar circulator. Furthermore, the comment raises alignment issues related to the current South Corridor SDEIS analysis, which would provide a more appropriate forum for these light rail alignment and service
Jim Howell, AORTA	4	Streetcars instead of the South Corridor light rail project should serve the South Waterfront area.	The existing streetcar system serves the South Waterfront area. The comment addresses the South Corridor Phase 2 Project, rather than the Portland Streetcar Loop Project.
Jim Howell, AORTA	5	The Eastside Streetcar Loop should cross the Willamette River on the Hawthorne Bridge.	Previous studies (including the 2004 South Corridor SDEIS) evaluated using the Hawthorne Bridge for fixed rail systems. The relatively low clearance of the Hawthorne Bridge requires more frequent lifts for river traffic than the other Willamette Bridges. These more frequent lifts would impinge on providing reliable transit service. The proposed project anticipates a future southern crossing of the Willamette River that would be constructed as a part of the South Corridor Phase 2 project. The Streetcar Central City Loop would use the yet-to-be determined crossing route that is expected to result from the Milwaukie LRT Project. See p. 2-3 of the EA, last paragraph.

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Commenter Name, Affiliation		Capsule Summary (see complete comment)	Response
Terry Parker	1	The primary purpose of streetcars is to subsidize private land development.	The Portland Eastside Loop Project, like most transit projects, has multiple objectives, including improving Portland Central City transit access and circulation, supporting existing and future transit investments that serve the Portland Central City, supporting economic development in the Portland Central City, and reducing reliance on single-occupancy vehicle trips to and within the Portland Central City. Because it will serve the Central City, many people in Portland would benefit from it.
Terry Parker		members should raise red flags.	Unlike previous Portland streetcar projects, TriMet would be the grantee of Federal funds for this project, not Portland Streetcar, Inc. The project would be a public infrastructure investment benefiting the community as a whole, which includes many property and business owners and residents. Partial capital funding would come from a local improvement district paid for by owners of properties located adjacent to or near the project route, and sponsorships would provide partial funding of operating costs. Consequently, participation in project development by property owners is both necessary and appropriate. Project development documents have listed advisory committee members and the members of the board of directors of Portland Streetcar, Inc., are listed on its web site, providing full disclosure. The Metro Council gave final approval of the Locally Preferred Alternative; it is made up exclusively of elected officials who have no personal financial stake in properties in the project area. 49 CFR § 18.36(b)(3), which would apply to TriMet as grantee, states, among other requirements, "No employee, officer or agent of the grantee or sub-grantee shall participate in selection, or in the award or administration of a contract supported by Federal funds if a conflict of interest, real or apparent, would be involved."

Commenter Name, Affiliation		Capsule Summary (see complete comment)	Response
Terry Parker	3	The streetcar will cause congestion on MLK Boulevard and Grand Avenue.	Traffic analysis for the proposed Portland Streetcar Loop Project has been done and indicates that the streetcar route would not significantly impact traffic along the route. In general the streetcar would move with traffic, with on-street stops affecting traffic similar to a TriMet bus. The alignment of the Portland Streetcar Loop would use the right-hand lane on Grand Avenue and MLK Boulevard, which would minimize any potential impacts on truck operations. Trucks on Grand Avenue are generally in the left hand lanes to access I-5 and the Willamette River bridges. Trucks from I-5 destined to the Brooklyn rail yard generally merge onto MLK Boulevard in the left-hand lane and generally do not transition into the right-hand lane until they are near or beyond the south end of the streetcar tracks. The Broadway bridge is generally less congested than some other Willamette River bridges. The Portland Streetcar Loop would provide another option for people to cross the Willamette River without using their cars. It is true that the streetcar Loop is within an urbanized inner-city area that is largely urban in nature and, therefore, traffic patterns are unlikely to change significantly from those of today.
Terry Parker	4	The Portland Streetcar Loop should be routed on 6th Avenue.	The alternatives analysis seriously considered, but rejected, use of 6th Avenue because "the zoning east of 6th Avenue is industrial sanctuary which limits the redevelopment potential of the area. The greater redevelopment opportunities, zoning, and existing fabric were influential in recommending the MLK/Grand corridor." See City of Portland, Eastsude Streetcar Alignment Study, June 23, 2003, p. 9.
Terry Parker	5	The Portland Streetcar Loop will require continuing public subsidies.	While the comment is correct that the project will require ongoing operating cost subsidies, all modes of transportation require subsidies. Higher transit ridership reduces the need for new street and highway facilities, yielding high cost savings. Expected increases in the cost of gasoline may increase ridership and future fare amounts are subject to adjustment, possibly reducing the amount of needed subsidies.
Terry Parker	6	The Portland Streetcar Loop should be able to stand on its own.	The project is intended to improve the operation of the transit system as a whole, not to operate independently of the rest of the transit system. Achieving the benefits for the transit system as a whole requires adjusting other components of the system as each new major transit facility opens for operations. In this case some buses will be rerouted. Transfers are a common and necessary feature of a comprehensive transit system.

Commenter Name, Affiliation		Capsule Summary (see complete comment)	Response
Terry Parker	7	In light of the previous points, the Portland Streetcar Loop is not "an efficient transportation option for the region."	This comment summarizes the commenter's previous comments. In addition to the responses to those comments, above, the project provides an alternative means of transportation in an area that will experience increasing congestion over time.
Allie Medeiros Kathy Rakers	1	The Portland Streetcar Loop would worsen congestion.	Simulation modeling of the proposed Portland Streetcar Loop indicates that the streetcar route would not significantly impact the traffic congestion along the route. In general the streetcar will move with traffic with on-street stops producing traffic impacts similar to a TriMet bus. There are ten locations where a streetcar-only traffic signal phasing is proposed. Only seven of those intersections require all other movements to stop. Four of those seven require only approximately five seconds to give the streetcar a space to merge into the through lane ahead of the general traffic. This would be similar to the amount of delay a vehicle would incur when it allows a bus to merge into traffic from a bus pull-out at the beginning of a green light. At three locations where longer delays are required to allow the streetcar-only phase would dissipate within one to three cycle lengths. The streetcar-only phases would be used only when the streetcar is present, which would be approximately every 11 to 15 minutes. There are no existing travel lanes, that are proposed for conversion to transit-only lanes. The transit only lanes proposed in the plan are created by using space currently designated for other uses, including parking lanes, shoulders, medians and, in limited cases, portions of extra-wide sidewalk. Providing a high quality transit mode on the proposed alignment will likely encourage some drivers to leave their cars at home and take the streetcar, freeing up some roadway capacity for other users.
Allie Medeiros Kathy Rakers	2	The traffic analysis does not include projections of opening year volumes.	The requirements for the EA do not include an analysis of opening-year traffic operations. The future year analysis includes projects listed on the Metro financially-constrained project list, as is typically done for a future-year traffic analysis and, given the expected increase of population and jobs in the year 2020, as compared with opening year 2010, the EA traffic analysis is more likely to identify traffic problems than an opening year analysis.

Affiliation Allie Medeiros	No. 3	Capsule Summary (see complete comment) The traffic analysis does not evaluate	Response The purpose of preparing the EA is to determine if the proposed project would result in significant
Kathy Rakers		added vehicle delay.	impacts. In this case a significant impact generally refers to a level of change to the transportation system that would reduce the level of service to below acceptable standards. The change in vehicle delay observed in the simulation models with and without the streetcar is not at that level. In fact, it is difficult to discern any repeatable, sustained change in vehicle delay when viewing the simulation. Changes in vehicle delay are small enough that they are only measurable when the cumulative delays of all vehicles in the model are compared.
Allie Medeiros Kathy Rakers	4	Streetcar service would be slowed by congestion.	It is true that the streetcar will be slowed by congestion because it generally travels with traffic. However, the lanes used by the streetcar on its route were chosen to reduce the impact of congestion on the streetcar and limit the impact of streetcar operations on general traffic. The lane the streetcar would travel in is generally the lane with the lowest traffic volume and least amount of delay. Transit-only lanes have been added in some locations on MLK Boulevard to improve streetcar travel time without removing existing general travel lanes. Additional turning lanes have been added to improve general traffic flow at some locations. Limited streetcar signal priority is proposed to improve streetcar travel times. These design features would continue to be refined as the design process moves forward, with the goal of providing a reliable and efficient streetcar service that impacts traffic operations as little as practical. Simulation modeling does not indicate added delay on the Broadway/Weidler Couplet from the presence of a streetcar that would cause queuing onto I-5. The streetcar is purposefully not in the lanes used primarily by traffic entering or exiting I-5. It is true that those ramps, especially the northbound off-ramp to Weidler Street, occasionally queue onto I-5 today. During peak periods, MLK Boulevard and Grand Avenue are congested today and some drivers divert to other routes. Drivers on MLK Boulevard and Grand Avenue today are generally drivers who prefer that route and are willing to live with the congestion. Minor and temporary increases in delay on these already-congested streets, as the streetcar moves through a location, are unlikely to be enough to cause drivers to change their routes.

Commenter Name,		Capsule Summary (see complete	
Affiliation		comment)	Response
Allie Medeiros	5	The Portland Streetcar Loop isn't	The project's purposes are to both provide a Central City transit circulator and encourage private
Kathy Rakers		essential to spur redevelopment.	investment, including new development and redevelopment. While previous redevelopment in the
			Central Eastside has been somewhat limited by the area being designated as an industrial
			sanctuary, only a small fraction of its capacity for redevelopment has been realized. In the two
			blocks on either side of the project alignment through the Central Eastside Industrial Area, 81
			percent of the floor area allowed by the zoning is unused (Table 5-1, Land Use Technical
			Memorandum, January 2008). The project's redevelopment purpose does not result from a
			streetcar line being essential to redevelopment. Instead, it results from a streetcar line serving as a
			catalyst and organizing tool for redevelopment. Supporting this effect are both the evidence in the EA and letters from project area property owners. See, in particular, the letter from the Lloyd
			Executive Partnership in Appendix B of the Locally Preferred Alternative Report, (July 20, 2006).
Sally Thomas	1	Turning the east side into another Pearl	The project would not determine the kind of redevelopment that would occur. The existing nature
Sally Thomas	1	District should be avoided.	of the land uses in the Lloyd District and Central Eastside will strongly influence the type of
		District should be avoided.	development and redevelopment that would be expected to occur. It is unlikely that
			redevelopment will be similar to the Pearl District because the Pearl was largely undeveloped
			prior to the Streetcar construction. Also, there are fewer large parcels on the east side, compared
			to the Pearl District, meaning redevelopment project will be on smaller parcels, and
			redevelopment is likely to take more diverse forms than in the Pearl District, including projects
			with a "fun funky DIV with a"
Sally Thomas	2	Will funding for the project reduce	Transit funding comes from sources that are not available for low income housing. Property
		funding for low-income housing.	owners will provide a share of the funding and most property owners are in support of the project.
			The Portland Development Commission (PDC) also supports the project and low income housing
			is among the objectives of the urban renewal district in the project area that PDC administers. The
			streetcar could make land it serves more suited for low-income housing by improving transit
			service to it.
Jim Howell	1	The Portland Streetcar Loop adds little	The project will add ridership and offers more capacity than bus service and includes among its
		new transit service.	purposes encouraging economic development. The project would implement the "inner city transit
			loop" from the Central City Plan.

Commenter Name, Affiliation	No.	Capsule Summary (see complete comment)	Response
Jim Howell	2	The Portland Streetcar Loop and No Build Alternative degrade existing bus serivce.	Implementation of any new fixed route transit service typically requires adjustments to the other transit service. Bus service in the area is typically adjusted to complement the newer fixed route service. In some cases the change in bus service could benefit some bus riders and reduce service to other riders. The reduction of bus service on MLK Boulevard and Grand Avenue is a tradeoff against the benefits that the Portland Streetcar Loop would provide, including higher capacity and the provision of a downtown transit circulator. Some riders would have reduced service, but many other riders would have improved service.
Jim Howell	3	The Portland Streetcar Loop should use the Steel Bridge instead of the Broadway Bridge.	The Broadway Bridge is the most direct connection between the Pearl and Lloyd Districts. It is also the best route to serve the Central City circulator function of the Streetcar Loop Project. Adding streetcar to the Steel Bridge would have the disadvantages of providing a less direct route, further concentrating fixed route transit on a single bridge, and improving transit where it already exists, rather than improving it on a different route.
Jim Howell	4	The Portland Streetcar Loop alignment should follow 7th Avenue.	Routing streetcars on 7th Avenue and Grand Avenues through the Lloyd District was selected as the preferred route because it would increase ridership compared to other routes that were evaluated, because it is closer to origins and destinations desired by riders. This deviation of the route from the MLK/Grand Couplet allows the transit service to extend further into the Lloyd District, where there is extensive high density and mixed use development that will generate higher ridership. Rails and overhead lines indicate to the public the streetcar route, helping to reduce confusion. The traffic analysis indicates that the project would not cause serious traffic problems on MLK Boulevard or Grand Avenue.
Jim Howell	5	The Portland Streetcar Loop should cross I-84 on a new bridge at 7th Avenue.	The alternatives analysis stated that "The proposed 7th Avenue Bridge is recommended to be implemented with or without streetcar crossing." See City of Portland, Eastsude Streetcar Alignment Study, June 23, 2003, p. 8. The bridge is not part of the proposed project because 7th Avenue was rejected as a route in favor of MLK Bouldvard and Grand Avenue.
Jim Howell	6	The added system ridership does not justify the cost of the Portland Streetcar Loop.	The purposes of the project are to provide a Central City transit circulator, support additional economic development, and add transit ridership to the system. The South Waterfront is served by the existing streetcar and will be served by the future Milwaukie LRT Project.

	Com-		
Commenter Name,		Capsule Summary (see complete	
Affiliation	No.	comment)	Response
Jim Howell	7	The Portland Streetcar Loop should be connected to the South Waterfront area via the Hawthorne Bridge.	Previous studies (including the 2004 South Corridor SDEIS) evaluated using the Hawthorne Bridge for fixed rail systems. The relatively low clearance of the Hawthorne Bridge requires more frequent lifts for river traffic than the other Willamette Bridges. These more frequent lifts would impinge on providing reliable transit service. As a result, the proposed project does not include a southern crossing of the Willamette River using the Hawthorne Bridge. Instead it contemplates completing a Central City loop with a future and as yet undetermined river crossing route, that is expected to be determined by the Milwaukie LRT Project. See p. 2-3 of the EA, last paragraph. Some transfers are an unavoidable feature of any transit system. The predominant volume of expected transit trips from Milwaukie to downtown will not require a transfer. The purpose of the Streetcar Loop is in part to disseminate trips coming from outside the area.
Jim Howell		The Portland Streetcar Loop should be routed differently in the vicinity of OMSI.	The alternatives analysis evaluated numerous routes, including some similar to the routing proposed in this comment. There are several important design constraints just east of OMSI. They include crossing of the Union Pacific Railroad (UPRR) and maintaining required clearance for the PGE electric transmission lines both vertically and horizontally. An at-grade crossing of the Streetcar alignment with UPRR would present safety and operational issues. To avoid these issues it was decided that the Streetcar would grade-separate this crossing with a bridge. The bridge is designed to provide proper clearance over the UPRR, avoid clearance issues with the overhead PGE transmission lines and separation from a transmission tower while maintaining grades that are less than 5%. When these issues are factored into the design, along with the desire to provide service to OMSI, they dictate where the alignment will be located west of the UPRR. After extensive evaluation and consideration of the above constraints, project sponsors selected the proposed alignment.
Julia Banzi		There should be a light rail link to Oaks Amusement Park and the Sellwood district.	The South Corridor Phase 2 (or Milwaukie LRT) Project would provide a transportation connection between the Central City and the Sellwood area, among other locations. The Portland Streetcar Loop would link to the South Corridor light rail line at the south end of the proposed project. It would connect the Lloyd District and other tourist destinations to the future LRT
Jean Anderson Pezzi	1	"The loop would provide simple no- transfer access to the inner eas side and provide the basis for later extensions."	Comment noted. The comment is consistent with the purpose of the proposed project.
Bev Anslow and Cicely Sullivan	1	The streetcar should run to Milwaukie, Gladstone, and Oregon City.	The South Corridor Phase 2 project is being planned to provide a high capacity transit connection between the Central City and Milwaukie.

	Com-		
Commenter Name,	ment	Capsule Summary (see complete	
Affiliation	No.	comment)	Response
David Johnson	1	The project should be phased.	Comment noted. The project staff evaluated several MOS options, and the project selected the full- length Project.
David Johnson	2	Will there be a sign language interpreter at the March 6, 2008, open house?	Metro's public involvement coordinator attempted to contact the commenter to answer his questions about the workshop. Metro provided a sign language interpreter at the workshop, but the commenter did not attend.
Bicycle Committee, Lloyd Transportation Management Association	1	bicycle accidents and result in conflicts among bicyclists, motor vehicles, and streetcars.	Project sponsors have also consulted on these issues with representatives of the Bicycle Transportation Alliance and bicycle staff of the Portland Office of Transportation and will continue to do so through preliminary engineering and project design. In particular, project sponsors will investigate placement of bike boxes at intersections with traffic signals along the alignment. A bike box is a green box painted on the street with a white bicycle symbol inside placed in front of the stop line for motor vehicles. Bicyclists are encouraged to wait in the box during red lights. The purpose is to help ensure that motorists see bicyclists when the light turns green, especially before making a right turn. The City of Portland has placed bike boxes at several locations in the City. For an illustration of a bike box, see http://www.portlandonline.com/transportation/index.cfm?c=46717&.



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March 10, 2008

Mark Turpel Metro 600 NE Grand Avenue Portland OR 97232-2736

Re: ODOT Comments on Portland Streetcar Loop Environmental Assessment

Dear Mr. Turpel:

Thank you for the opportunity to review the supporting documentation for the Portland Streetcar Loop Environmental Assessment (EA). Our staff review focused on the Local Traffic Technical Memorandum and the supportive data and traffic modeling files, as well as the engineering design for the proposed streetcar loop. ODOT fully supports public transit and works hard to help implement transit improvements consistent with state policies and standards. We believe additional information, analysis, and discussion will help to more fully identify and develop the streetcar project and ensure the safe and efficient operation of the transportation system. We recommend that Portland Streetcar Inc. continue working with us to resolve these issues in project development, as issues that are deferred to the final engineering phase may be difficult and expensive to resolve at a later date.

An important issue for ODOT is the proposed streetcar's affect on traffic operations on ODOT facilities, particularly the I-5/Broadway/Weidler interchange. Wherever ODOT owns or controls facilities or traffic control systems on the proposed streetcar route, we must ensure state standards are met and maintained as a condition of the streetcar's construction and operation.

We look forward to working with Portland Streetcar planners and engineers in the near future to work through our traffic operations and safety issues.

Sincerely,

Jason Tell Region 1 Manager

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Streetcars on the Transit Mall

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Streetcars are a better fit on the transit mall than are light rail trains. AORTA opposed building light rail on the mall for many reasons, but since the tracks are there, why not use them for a more appropriate street friendly mode?

When the mall reopens in 2009, Green and Yellow Line trains will operate on it. Nevertheless, it is not a certainty that in the future, the Milwaukie Line will link up with the Yellow Line at the south end of the mall. It could yet be routed on the eastside to link up at the Rose Quarter eliminating the need to construct what could be a very expensive bridge. By avoiding two river crossings and slow mall operation, costs could be much less and ridership could be higher, making this alignment more cost effective.

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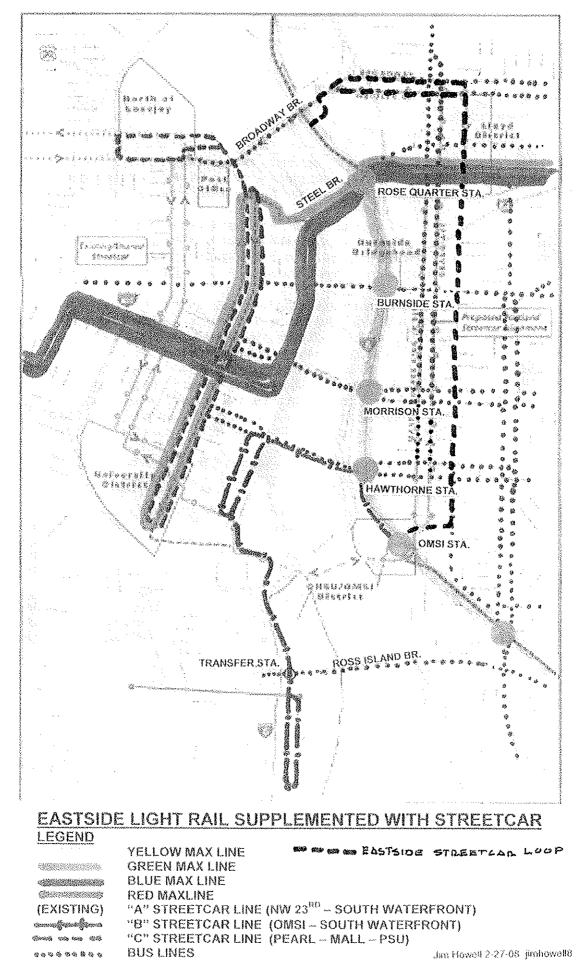
State of the art transfer stations at the Rose Quarter and at the bridgeheads could provide quick and convenient transfer connections by bus, streetcar and light rail to the downtown and the eastside. The Yellow Line could then provide fast direct north-south service between Hayden Island (Clark County in the future) and Milwaukie (Oregon City in the future).

Without Yellow Line trains on the mall, streetcars could fill the void. Being smaller and designed for slower operation and more frequent stops, they are more compatible for mall service intermixed with buses and private vehicles. If a short segment of streetcar tracks were laid connecting the Pearl District to the Transit Mall, a streetcar loop route could be established that would interconnect the Pearl District, Union Station, Pioneer Square and Portland State with frequent shuttle service.

South Waterfront would be better served with transit by a direct streetcar line from the eastside rather than the Milwaukie Light Rail Line.

Streetcar tracks laid on the Hawthorne Bridge and First/Naito connecting the Yellow Line at the east end of the Water Avenue Ramp with the Portland Streetcar on SW Harrison would provide a direct connection between them. Another streetcar loop route could then be established between OMSI and South Waterfront while providing service to the East Hawthorne MAX Station and the South Auditorium District. This could be the first segment of the proposed Eastside Streetcar Loop. (see attached map)

Jim Howell, AORTA Representative to PDNA jimhowell89@hotmail.com 2-26-08



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The Proposed Portland Eastside Streetcar Loop

Testimony and straight talk March 6, 2008 from; Terry Parker P.O. Box 13503 Portland, OR 97213-0503

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1. The p governm Supporte

1. The primary purpose for expanding the streetcar system in Portland is to have the government subsidize development on private property rather than as a transportation option. Supporters including those in the political arena routinely call the streetcar a "development tool".

2. Many of the members of the non-profit Portland Streetcar Board of Directors and advisory committees will receive personal financial gain by an expansion of the system. The individuals either own property adjacent to the proposed route or they are in line to receive contracts related to the project if expansion is approved. This should immediately raise red flags.

3. With the streetcars traveling at a snails pace and obstructing traffic when stopping for passengers in motor vehicle traffic lanes, the proposed route of the streetcar loop on the high traffic volume city arterial streets of MLK and Grand Avenues will only add more congestion to an already congested inner Eastside. Adding to that congestion on MLK and Grand Avenues will be more tractor trailer semi-trucks due to an anticipated expansion of the rail-truck transfer facility at the Brooklyn Rail Yards South of the streetcar alignment. Routing the streetcar over the Broadway Bridge will add to traffic congestion to the river crossing. Additionally, as compared to busses, once the tracks are in place, flexibility due to changing traffic and growth patterns, or unforeseen circumstances, any rerouting of the system is simply not easily done.

4. The proposed alignment of the streetcar is in the wrong place. Instead of using MLK and Grand avenues as the North-South route; a far better alignment for both directions is Sixth Avenue, a low motor vehicle volume street which parallels MLK and Grand Avenues one city block to the East. A Sixth Avenue alignment would provide a far better pedestrian friendly atmosphere while not having the negative impacts of creating additional traffic congestion that can be harmful to the environment.

5. Public subsidies for the streetcar will not end with the completion of construction. Unless a fare structure is implemented that better reflects the costs of providing the service, annual reoccurring public subsidies will be required for continual operation. The people that use the system principally use it because it is cheap, a bargain at taxpayer expense. With the current streetcar system, fare evasion continually goes unchecked. Keeping fares under-valued or free is a politically motivated ploy to increase the ridership numbers. Since public funding must be significantly increased to subsidize streetcar operations, a system expansion automatically places future generations of taxpayers into paying a reoccurring debt for the relatively small percentage of region wide trips that are projected to occur on the streetcar loop.

6. To come up with adequate projected ridership numbers for the streetcar loop to pass muster as an efficient transportation option, bus lines had to be rerouted to feed into and require transfers to the streetcar for riders to get to popular destinations. The streetcar should be able to stand on its own without this kind of manipulation of the projected ridership numbers.



In conclusion, a bottom line that takes into consideration the outright expense of the patched together local financial match to construct the loop, the additional burden being placed on local taxpayers to subsidize the annual operating costs, the manipulation of projected ridership numbers to make the loop proposal look creditable, and the sluggish speed at which the streetcar will travel along with the additional congestion the streetcar will create purely demonstrates that expansion of Portland's streetcar system does not pencil out as being an efficient transportation option for the region.



Trans System Accounts - Portland Streetcat

From:	"Allie Medeiros" <allie.medeiros@gmail.com></allie.medeiros@gmail.com>
To:	<trans@metro.dst.or.us></trans@metro.dst.or.us>
Date:	3/6/2008 5:23 PM
Subject:	Portland Streetcat

Date:

Re: Comments on Proposed Portland Streetcar Loop

To Whom It May Concern:

This letter is to express serious concern over the negative impacts of the Portland Streetcar Loop project that proposes to extend the streetcar line across the Broadway Bridge to OMSI via Martin Luther King Boulevard and Grand Avenue.

Clearly, the streetcar loop would worsen traffic congestion along the proposed route. This is because some streetcar stops are in travel lanes, because 10 intersections are proposed to have "streetcar only" traffic signal phases (which stop traffic in all directions so the streetcar can change lanes), and because some existing travel lanes would be converted to transit-only lanes. These traffic system changes essentially redistribute existing capacity from cars, trucks and buses to the streetcar.

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Exactly how bad the traffic impacts would be is not known, because the traffic analysis done for the streetcar loop environmental assessment does not include an evaluation of traffic operations the year the streetcar opens. It only analyzes the streetcar's impact in the year 2025, and assumes a number of planned road capacity improvements that may never be built. Also, the traffic analysis does not evaluate added vehicle delay, the most direct measure of the streetcar's impact on other traffic. An assessment of opening year performance and delay is common practice in transportation analysis. It can only be assumed that this analysis was excluded to misrepresent the streetcar's real impacts.



While the specific traffic impact of the streetcar is not known, it appears obvious that streetcar planners have failed to meet their own requirements for traffic operations: that the streetcar would "not exacerbat(e) current or forecast traffic congestion," and that it would "provid(e) for reliable and efficient streetcar service." Not only will the streetcar exacerbate congestion, but the streetcar itself would be slowed down by congestion, resulting in service that is neither reliable nor efficient. Elsewhere on the system, the streetcar is likely to create spillover impacts. For example, as traffic exiting I-5 encounters added delay at the Broadway and Weidler traffic signals, ramp backups could extend into the freeway, blocking I-5. Meanwhile, to avoid added congestion on MLK/Grand, drivers would be likely to divert to other north-south routes, adding traffic and congestion in neighborhoods far from the streetcar line. Other negative impacts would include increased air pollution from vehicles stuck in traffic, and higher freight costs due to increased travel times.



In addition to the alarming traffic impacts, there is a significant question as to the need for the proposed streetcar loop. The environmental assessment states that the streetcar is needed not to serve a transportation function, but to revitalize and redevelop the Central Eastside. The environmental

assessment states the streetcar loop would "provide the essential spark to economic development that the streetcar provided in the Westside Pearl District." Redevelopment of the Central Eastside has not been hindered by the lack of a streetcar, but because much of the area was an industrial sanctuary that until recently had zoning restrictions that prevented redevelopment. While a streetcar is a public amenity that may quicken redevelopment, no evidence is provided that it is essential for redevelopment to occur.

I support transit and transit-oriented development. But transit projects should be based on good planning and a full evaluation of costs, benefits, impacts and trade-offs. I urge that the streetcar loop project not be approved without an open, honest evaluation identifying all of the costs and impacts, and seriously considering other alternatives to meet real transportation needs. Please include this letter in the record of public comment for the streetcar loop environmental assessment.

Sincerely,

Allie Medeiros

5322 N Borthwick

Portland, OR 97217

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Trans System Accounts - Portland Streetcar Concerns

From:	Cathy Rakers <rukind66@gmail.com></rukind66@gmail.com>
To:	<trans@metro.dst.or.us></trans@metro.dst.or.us>
Date:	3/4/2008 9:00 AM
Subject:	Portland Streetcar Concerns
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Date: 3/4/08

Re: Comments on Proposed Portland Streetcar Loop

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Exactly how bad the traffic impacts would be is not known, because the traffic analysis done for the streetcar loop environmental assessment does not include an evaluation of traffic operations the year the streetcar opens. It only analyzes the streetcar's impact in the year 2025, and assumes a number of planned road capacity improvements that may never be built. Also, the traffic analysis does not evaluate added vehicle delay, the most direct measure of the streetcar's impact on other traffic. An assessment of opening year performance and delay is common practice in transportation analysis. It can only be assumed that this analysis was excluded to misrepresent the streetcar's real impacts.



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Sincerely

Cathy Rakers 2021 N. Jessup St. Portland, OR 97217 From: To: Date: Subject: Sal <sal97206@yahoo.com> <trans@metro.dst.or.us> 3/6/2008 1:00 PM streetcar project

Greetings,

I am writing to express a couple of concerns about the proposed "streetcar to the central east side" project.



It seems that the primary push for this thing is in the name of "development". More tourism dollars and more jobs for locals would be just fine. Turning the east side into another Pearl District would not. The east side has a fun, funky, DIY vibe that we want to keep alive.

The projected costs (which are nearly always underestimated) seem high in relation to the potential benefits. What will we have to give up in order to pay for it? Will funding for other transit options and for affordable housing projects be cut because of the streetcar?

I urge you to consider these issues carefully when deciding whether or not to push ahead with this project.

Thanks,

Sally Thomas 3518 SE 65th Avenue Portland, OR 97206 (503) 998-1417

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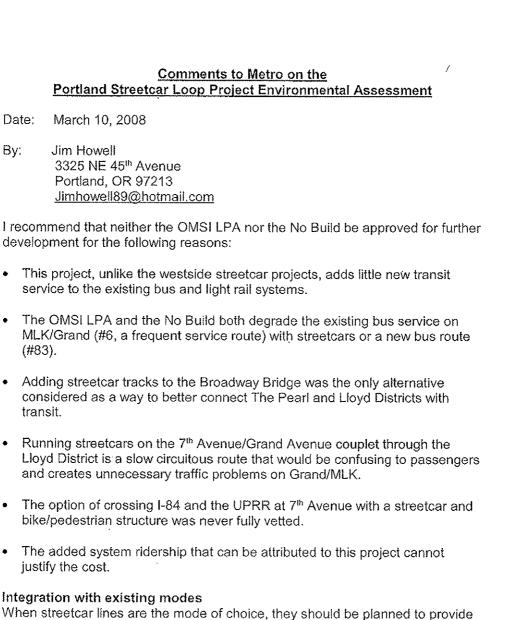
Trans System Accounts - EA Comments Attention Mark Turpel

From:	Jim Howell <jimhowell89@hotmail.com></jimhowell89@hotmail.com>
То:	<trans@metro-region.org></trans@metro-region.org>
Date:	3/10/2008 9:26 AM
Subject:	EA Comments Attention Mark Turpel
Attachments:	Comments Streetcar Loop EA.doc; seventh ave alignment.jpg; proposed routing0001.jpg

Mark,

Please include the attached as my comments on the Portland Streetcar Loop Project Environmental Assessment. Thanks, Jim

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When streetcar lines are the mode of choice, they should be planned to provide "needed" transit service, not to duplicate what is or can be provided more efficiently by other modes. This is what the city did when it developed the current streetcar system and it is why it is so successful.

The first phase of the Portland Streetcar provided a "needed" transit connection between the Northwest District and the PSU area. The direct connection between the 11th/12th couplet and Lovejoy/Northrup was only possible after the Lovejoy Viaduct and the BN railroad yards were eliminated for the development of the Pearl District. The extension to PSU was only possible with the

cooperation of PSU to lay tracks through its campus. The streetcar extension to

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South Waterfront was possible only with a new street connection between Harrison Street and Harbor Way. On the other hand, the plan for the Eastside Streetcar Line, except for the OMSI connection over the UPRR, provides no new connections and duplicates existing bus service.

The Broadway Bridge

Alternatives to a very expensive alteration to the recently refurbished Broadway Bridge for streetcar tracks were never considered.

An obvious alternative is to provide this direct connection between the Pearl and Lloyd Districts with the #77 bus, which now runs on the Steel Bridge. It currently shares the streetcar stops on Lovejoy and Northrup and would also share the stops proposed on Broadway and Weidler. It provides 112 daily trips between Montgomery Park in Northwest Portland and Troutdale, connecting the Pearl, Lloyd, Hollywood and Gateway Districts with Wood Village and Troutdale in the Broadway-Halsey corridor with a bus every 15 minutes.

A more productive eastside streetcar link would be over the Steel Bridge (1). It would serve more existing destinations and would provide transit access to the yet-to-be-developed North Riverfront Area. By extending tracks east on Northrup and Marshall to Station Way, and then south to the MAX tracks on Irving Street, streetcars could share the MAX tracks on the Steel Bridge and the Yellow Line north to NE Larrabee Street.

This alignment would generate ridership from new stops at the east end of Northrup and Marshall Streets, Union Station and possibly one at NW 3rd and Glisan. It would also provide better service to the Rose Quarter and the Convention center at the existing MAX Yellow Line platform.

An added feature of this alignment is the opportunity to route streetcars between the Pearl District and PSU on the transit mall.

Seventh Avenue Alignment

The area along Seventh Avenue south of Sullivan's Gulch is not intensely developed and would support more opportunities for new development than MLK/Grand. It now lacks transit service, whereas MLK/Grand has excellent bus service (148 trips a day) with the MLK #6 corridor bus route that connects Hayden Island to the transit mall and PSU.

The Lloyd District would be better served with two-way streetcar operation on Seventh Avenue, which is a two-way street. It would be more intuitive and easier to understand than the proposed split operation, with streetcars going in one direction on a two-way street and the other direction on a one-way street, with two blocks between them. It would also eliminate time consuming streetcar turns at Grand and Broadway, and at Oregon and MLK. This would eliminate the negative traffic impacts of streetcars on the very busy MLK/Grand couplet.



A new streetcar/bike/pedestrian bridge across Sullivan's Gulch linking the Lloyd District to the Inner eastside could probably be constructed with the money saved by not running tracks over the Broadway Bridge.

Potential ridership

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A great opportunity is being missed by not directly linking the eastside with the entire South Waterfront Area. As currently planned, both the eastside streetcar and the Milwaukie light rail will require passengers to transfer to the existing streetcar line at the west end of a new Willamette River Bridge to access most of South Waterfront (2). On the other hand, if the streetcar were routed across the Hawthorne Bridge and south through South Waterfront, with a junction to the existing line on Harrison Street, it would provide this vital direct link without transfers.



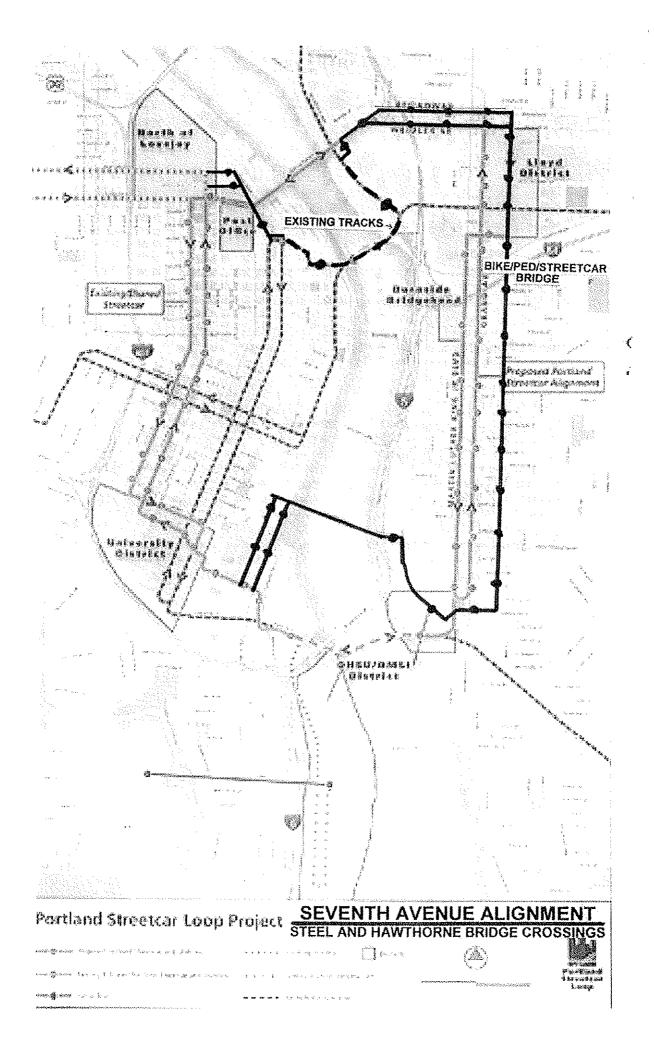
The UPRR overpass is the only new transit link proposed with the OMSI LPA. If the line turned north instead of south after crossing over the UPRR, a stop could be located much closer to OMSI's main entrance. In addition, PCC could be served with a stop at the foot of the Water Avenue Ramp. The alignment could cross on the middle lanes of the Hawthorne Bridge and then southbound on First Avenue to Harrison Street. Northbound, it could run along the east edge of Naito Parkway. New stops along this segment would improve transit access to the South Auditorium Urban Renewal Area.

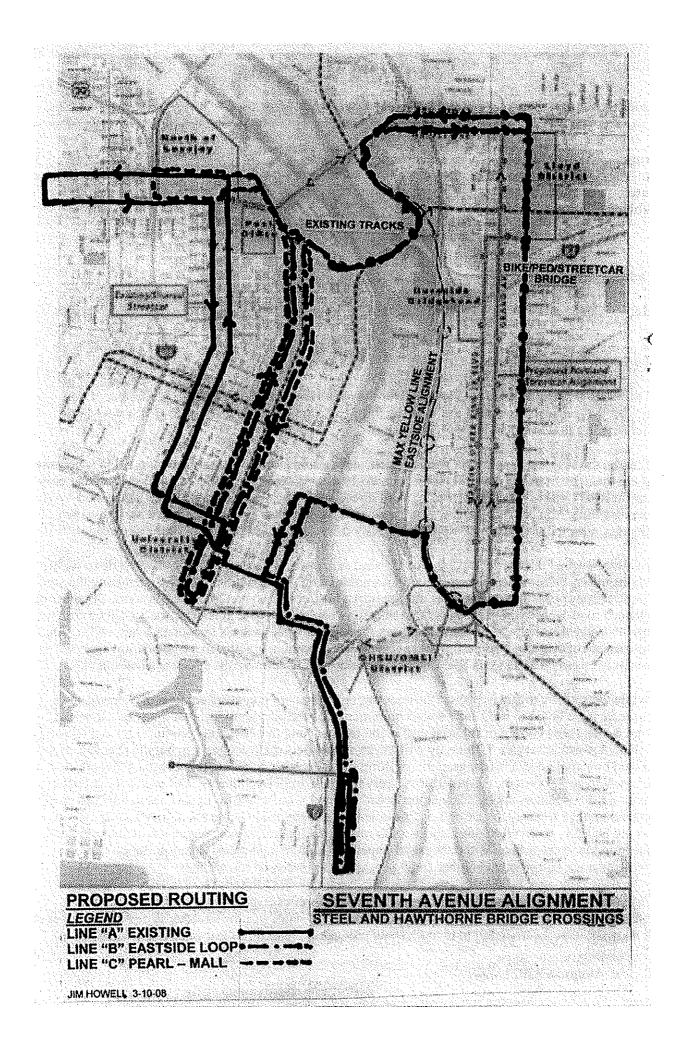
This project needs a lot more work. Some of the above changes would provide more streetcar access to activity centers and new development sites, coordinate better with existing modes, and stimulate more system-wide ridership.

- (1) If the MAX Yellow Line were routed on the eastside, bridge capacity would not be an issue.
- (2) If the MAX Yellow Line were routed on the eastside, this bridge would not be needed.

Attachments:

- Seventh Avenue Alignment
- Proposed Routing





(3/10/2008) Trans System Accounts - loop

From: To: Date: Subject: "Al-Andalus: Tarik & Julia Banzi" <music@andalus.com> Portland Metro Planning <trans@metro.dst.or.us> 3/1/2008 12:55 AM loop

Hello,

If you are planning a loop which FINALLY includes Southeast you must include Oaks Amusement park in the loop. The linking of Oaks Park with OMSI is so very important.

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I think you ought to think broader and in terms of attracting tourism to the area. A light rail loop which connects some of Portlands tourist areas such as Oaks Amusement Park (and the festivals which happen there) together with OMSI, the historic Sellwood bridge and antique row (13th avenue) in Sellwood is an attractive trip to outsiders visiting the area.

The logical thing would be to come down the river and then up Tacoma street starting at 6th. Integrating the loop into the Sellwood Bridge project would also be ideal.

Why are you going to put a loop on an ugly street such as Grand/MLK where people neither walk nor bicycle does not make a whole lot of sense. Are we spending all this money only to help Clackamous county residents? No, lets help out the whole city and build the loop in a place which makes commuter and tourist sense.

Thank you,

Julia Banzi 503-230-2379 ÷₹

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Trans System Accounts - portland streetcar loop

 From:
 "Ugo pezzi" <jeanugo@hevanet.com>

 To:
 <trans@metro.dst.or.us>

 Date:
 3/1/2008 11:46 AM

 Subject:
 portland streetcar loop

We strongly support this proposal. Like many who live downtown we try to virtually eliminate car use. We walk, often returning via streetcar.

The loop would provide simple no-transfer access to the inner east side and provide the basis for later extensions.

We are in our 9th decades -- and appreciative to have the streetcar to extend our world.

Jean Anderson Pezzi

Page 1 of 1

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Trans System Accounts - street car comments

From:	<banslow@aol.com></banslow@aol.com>
To:	<trans@metro.dst.or.us></trans@metro.dst.or.us>
Date:	3/1/2008 5:09 PM
Subject:	street car comments
· · · · · · · · · · · · · · · · · · ·	ни у сконственной честеление на на указание на народни и напродение, как и на стор с у су сторо, как на консерсион

We would very much like the street car to run from Portland to Milwauke. If it is possible we would like it to run to Gladstone and Oregon City.

Bev Anslow, 145 E Dartmouth, gladstone, OR Cicely Sullivan 335 W Clackamas Blvd, Gladstone, OR

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1 1 2008

Monday, February 11, 2008

Portland Streetcar Loop 600 NE Grand Avenue Portland, OR 97232

Delivery to facsimile: 503-797-1930

The Honorable to Transportation Planning;

I urge to endorse on Streetcar Loop; however, I urge a first construction on Oregon MOS segment from NW to N & NE on two way then I think that best way for two way on NE 7th Avenue connects with MAX Light Rail Station on NE 7th segment gets early bird construction then start up service for Oregon MOS only.

Next Two Segment from Oregon MOS to Morrison MOS and OMSI MOS gets second construction and start up service. I endorse bus service #83 runs OMSI to South Waterfront Streetcar for temporary times with every 15-minute daily places from #6 MLK frequently as recommend reduced 6 MLK frequently from 15 to 30 minute daily and reduced route.

In continually, I endorse for Full Loop MOS with LRT on a new bridge.

In telling the truth, I support bus trolleys, Bus Rapid Transit, Streetcars, commuter, and LRT in Portland regional areas. I want seeing Streetcar goes over the Columbia/Willamette Rivers at recommendations.

May I have come to your meeting on March 6, 2008 with if provided sign language interpreter? Could you invite me to attend to where place on March 6, 2008? I wonder if there provide some refreshment? I need their address for a meeting site.

Sincerely,

M. David Johnson

David Johnson 731 SW Salmon St, #1116 Portland, OR 97205



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March 7, 2008

Ms. Vicky Diede Streetcar Technical Committee Office of Transportation 1120 SW Fifth Avenue, Room 800 Portland, OR 97204

Dear Ms. Diede,

I am writing on behalf of the Lloyd Transportation Management Association's Bicycle Committee. We understand that the EA public comment period for the Portland Streetcar Loop is primarily focused on alignment issues as distinct from technical aspects. However, after reviewing the existing preliminary designs for the streetcar loop, we are disturbed by the potential for bicycle accidents and the probability of conflicts between bicyclists and motor vehicles or streetcar -- issues that could affect the planned alignment.

Obviously everyone wants a safe and balanced transportation system in Lloyd in keeping with the district's vision and development plan. For the record, we request active participation in the design process and in reviewing streetcar plans in order to help achieve this common goal.

Sincerely,

Shelley Oylear Chair, Lloyd TMA Bike Committee

Moira Green Program Manager, Lloyd TMA

cc: Kay Dannen Technical Committee, Shiels Obletz Johnsen

> Scott Bricker, Executive Director, BTA

Appendix C PROJECT DESIGN AND MITIGATION COMMITMENTS

Subject		Page No. in Environ- mental
and No.	Commitment	Assessment
	T DESIGN AND OPERATION	
Parking		
1.	Reduce the number of displaced parking spaces by refinements during final design.	3-5
2.	Prepare and implement a parking mitigation plan with the goal of replacing displaced parking.	3-5
Bicycle an	d Pedestrian Facilities and Safety	•
3.	Design and sign crossings at designated bicycle streets to ensure bicycle safety and use either bicycle-only, pedestrian-only, or bicycle- and pedestrian-activated signals or signal cycles.	3-6
Truck Fre		Γ
4.	Keep lane widths on all streets where the streetcar tracks would be installed a minimum of 11 feet.	3-7
Historic R		
5.	Design improvements to the Broadway Bridge to be consistent with the bridge's visual and structural design and so that operating the streetcars across the bridge would not result in any structural damage to it.	3-28
Geology a	nd Earthquake Resistance	
6.	Design the aerial viaduct structure over the railroad lines and all modifications to existing structures, including the Broadway Bridge, in accordance with the American Association of State Highway and Transportation Officials Load and Resistance Factor Design Bridge Design Specifications (4 th edition, 2007), as modified by the ODOT 2004 Bridge Design and Drafting Manual, with all applicable updates and revision through 2007, for 500 and 1,000-year earthquakes.	3-32 to 3-33
Water Qu	ality and Hydrology	
7.	Treat all runoff with Stormfilter® or equivalent.	3-39
	CT CONSTRUCTION	
Property A	Acquisition and Relocation	
8.	Comply with all applicable Federal, state, and local regulations in acquiring any property required for project construction.	3-15
9.	Comply with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 if any relocations become necessary.	3-15

Subject and No.	Commitment	Page No. in Environ- mental Assessment
Archaeolo	ogical Resources	
10.	If archaeological materials were encountered during construction, cease all construction activity in the vicinity, contact appropriate state, Federal, and/or tribal officials, evaluate the nature and significance of the discovery, and identify an appropriate course of action. If an archaeological find is determined to be significant, mitigate through avoidance or data recovery.	3-29
Hazardou	is Materials	
11.	Perform a Phase I environmental review on all property acquired by the project before it is purchased, to comply with FTA Circular 5010.1C, Chapter II.2 (October 1, 1998)	3-32
12.	Conduct a Phase II environmental site assessment on a property if a Phase I review indicates uncertainties or that contamination may be present.	3-32
13.	Monitor soils during construction and manage appropriately any contaminated soil encountered, including excavation and proper disposal of soils by properly trained and equipped subcontractors before construction proceeds.	3-44
Worker a	nd Public Safety	•
14.	Prepare and implement a health and safety plan for all construction activities consistent with applicable laws and regulations, including the requirement for an occupational medicine monitoring program.	3-32
15.	Prepare and implement a hazardous materials work plan that includes actions to be implemented if construction activities encounter contaminated soil.	3-44
16.	Perform all construction work in full coordination with TriMet and Portland Streetcar, Inc., and comply with all applicable safety requirements.	3-42
Traffic ar		1
17.	Coordinate construction on the Broadway Bridges with Multnomah County to minimize disruption to traffic crossing the Broadway Bridge or the navigation channel in the river.	3-40
18.	Maintain one lane of traffic in one or both directions, minimize the duration of sidewalk closures, and stage construction on the lift-spans to keep one operational at all times.	3-41
19.	Develop a Broadway Bridge construction plan to comply with applicable U.S. Coast Guard regulations, including planned bridge closures that would affect river traffic, in consultation with the U.S. Coast Guard and river users.	3-43
20.	Construct streetcar tracks in reaches determined in coordination with City traffic engineers to expedite construction activities while minimizing disruption of automobile, pedestrian and bike traffic. reetcar Loop Finding of No Significant Impact (FONSI) and Other Determinations of Environment	3-41

Subject and No.	Commitment	Page No. in Environ- mental Assessment
21.	Maintain vehicular and pedestrian access for all residents and businesses in the vicinity of the project at all times through the use of signing, fencing, bridging over construction trenches, and flaggers.	3-41
22.	Use localized block by block construction, temporary transit stops, and steel plating to bridge construction trenches to provide pedestrian and business access and minimize closure of traffic lanes, parking lanes and/or turn lanes or turning restrictions.	3-42
23.	Maintain side street access through the use of steel plating across construction trenches whenever feasible.	3-42
24.	Use typical construction management practices to avoid or minimize adverse economic consequences to occupants, such as avoiding full access closures, providing temporary alternate access and signage, and timely communications with business owners.	3-43
Noise and	Vibration	
25.	Limit nighttime construction activities to the rail-pulls associated with crossing the existing light rail lines on NE Holladay Street and connecting to the existing streetcar system in the Pearl District.	3-41
26.	Comply with the City of Portland's noise ordinance.	3-41 to 3-42
27.	Obtain and comply with noise variances obtained from the City of Portland for any nighttime construction.	3-42
Transit O		
Freight O	Notify riders of detours and closed/temporary bus stops.	3-42
28.	Develop a freight rail temporary closure plan in cooperation with the Union Pacific Railroad, Oregon Pacific Railroad, and the Federal Railroad Administration.	3-43
29.	Provide truck detour signs as necessary and do not close truck routes during construction.	3-42
Air Quali	ty	
30.	Require construction contractors to use reasonable measures to control fugitive dust, such as applying water or other dust suppressants during dry weather.	3-44
Water Qu	ality	
31.	Comply with the City of Portland's <i>Erosion and Sediment Control Code</i> .	3-45
Biological	Resources and Endangered Species	
32.	Include in construction specifications the provisions below, which come from Section 00290.32 of the Broadway Bridge Containment Plan.	Environmental Assessment p. 3-37, Biological Evaluation p. 10, ff.

Subject and No.	Commitment	Page No. in Environ- mental Assessment
	00290.32 Work Containment Plan and System - A work	
	containment plan (WCP) and a work containment system (WCS) are required on this Project.	
	 Conditions of the WCP would include the following: All reasonable attempts by the Contractor shall be made to avoid or minimize habitat modifications that will impair the ability of threatened, endangered, proposed, or selected sensitive species to complete essential biological behaviors, such as breeding, spawning, rearing, migrating, feeding, and sheltering. Before submitting the WCP, the Contractor shall meet with TriMet to review the Contractor's Draft WCP and to ensure that all parties understand the locations of sensitive biological sites and the measures to be taken to avoid and protect them. The Contractor shall notify TriMet at least three days before beginning work containment construction activities. TriMet reserves the right to stop work and require the Contractor to change the WCP methods and equipment before any additional Contract work, at no additional cost to the Agency, if and when, in the opinion of the TriMet, that such methods jeopardize the safety of traffic or the integrity of the new structure, or destroy aquatic life or habitat in the Regulated Work Area. (a) Work Containment Plan (WCP) - The WCP shall identify the prevention and construction perations including but not limited to mobilization, construction, operation, or demolition activities. Show complete isolation of the Regulated Work Area as defined in Oregon Department of Transportation Environmental Protection 00290.30(a-1). Provide complete containment measures that prevent debris and work materials from entering the Regulated Work Area. 	

Subject and No.	Commitment	Page No. in Environ- mental Assessment
	• Show precautions and implement measures to prevent rubble (dust,	
	concrete debris and saw cutting by-products, welding slag and	
	grindings) and work materials from construction and demolition	
	activities from entering the Regulated Work Area.	
	• Prohibit the use of treated timber.	
	• Prohibit the use of concrete form release agents.	
	• Implement full containment fueling procedures.	
	• Require the WCS to be fire retardant or resistant to fire from welding	
	slag, torch operation or any sparks from the Work.	
	• Require the WCS to be weather resistant.	
	 Prohibit the use of barges as containment devices. Prohibit stocknilling of domelition materials within 150 feet of 	
	• Prohibit stockpiling of demolition materials within 150 feet of wetlands and regulated	
	work areas.	
	(b) Work Containment System (WCS) - The WCS shall:	
	• consist of a containment system (web) The web shall.	
	work begins. Design the containment system for not less than the	
	system self-weight plus 25 psf live loading, or system self-weight plus	
	debris weight plus removal equipment weight, or load combinations.	
	Debris weight includes the possibility of a concrete form failure,	
	concrete spills, and any other construction material load imposed on	
	the containment system.	
	• show specific attention to the need for special care in demolition	
	work. Provide all required shoring, bracing, barricades, fencing, and	
	other devices that may be required, and exercise all necessary	
	precautions to fully protect pedestrian, vehicular, and navigation	
	traffic, and to minimize disturbance to the Regulated Work Area and	
	waterway, and to prevent damage to the new bridge or other structures.	
	• be designed and stamped by a registered Professional Engineer who	
	shall include all load assumptions and calculations and submit stamped	
	working drawings to the Agency according to 00150.35.'	
	The Contractor shall:	
	• Be fully informed of the conditions of the General Conditions in the	
	NPDES permit, which governs operations, and conduct construction	
	• Mointain a conv of the Concrel Conditions at the construction site	
	• Maintain a copy of the General Conditions at the construction site.	
	These will be made available to the operating personnel during construction activities.	
	 Develop a Pollution Control Plan (PCP) to prevent point-source 	
	pollution related to Contractor operations. This plan shall satisfy all	
	pertinent requirements of Federal, State and Local laws and	
	regulations, and the requirements of these special provisions.	

Subject and No.	Commitment	Page No. in Environ- mental Assessment
	 Other conditions relating to the WCS are: Contaminated or sediment-laden water from the project shall not be discharged directly into any waters of the State until satisfactorily treated by using filters, bio-bags, or dirt bags. For track-mounted equipment, large cranes, and other equipment whose limited mobility makes it impractical to move it for the refueling, the Contractor shall take precautions to minimize the risk of fuel reaching the active channel. The Contractor shall implement spill prevention measures and provide fuel containment systems designed to completely contain a potential material spill, as well as other pollution control devices and measures adequate to provide containment of hazardous material. The Contractor shall perform refueling operations to minimize the amount of fuel remaining in vehicles stored on the bridge during nonwork times. Refueling shall not be done for those vehicles remaining on the bridge at the end of the workday. The Contractor shall implement containment measures adequate to prevent pollutants or construction and demolition materials, such as waste spoils, petroleum products, concrete cured less than 24 hours, silt, welding slag and grindings, concrete saw cutting, by-products and sandblasting abrasives from entering the active channel or any other waterway. 	11 to 12

Agency or Affiliation **FEDERAL AGENCIES**

Federal Emergency Management Federal Emergency Management Federal Highway Administration Federal Highway Administration Federal Railroad Administration Federal Transit Administration Federal Transit Administration Federal Transit Administration Office of Congressman Earl Blumenauer US Army Corps of Engineers **US Coast Guard** US Environmental Protection Agency **US Environmental Protection Agency** US Fish and Wildlife US Department of Energy, Bonneville Power Administration

INDIAN TRIBES

Chinook Tribe Confederated Tribes of the Grand Ronde Cowlitz Tribe Siletz Warm Springs

STATE AGENCIES

Oregon Department of Economic & Community Development Oregon Department of Energy Oregon Department of Environmental Quality Oregon Department of Environmental Quality Oregon Department of Fish and Wildlife Oregon Department of Land Conservation & Development **Oregon Department of State Lands** Oregon Department of Transportation Oregon Department of Transportation Oregon Department of Transportation Oregon Department of Transportation Oregon Department of Water Resources **Oregon Public Utilities Commission Oregon State Historic Preservation Office** State Parks and Recreation Department

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Individual

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Agency or Affiliation

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