11-10-1994

Meeting Notes 1994-11-10

Joint Policy Advisory Committee on Transportation

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Meeting: JOINT POLICY ADVISORY COMMITTEE ON TRANSPORTATION

Date: NOVEMBER 10, 1994

Day: THURSDAY

Time: 7:15 a.m.

Place: METRO, CONFERENCE ROOM 370

*1. MEETING REPORT OF OCTOBER 13, 1994 - APPROVAL REQUESTED.


*3. TPAC RECOMMENDATIONS ON REGION 2040 - APPROVAL REQUESTED - Andy Cotugno.

*Material enclosed.
MEETING REPORT

DATE OF MEETING: October 13, 1994

GROUP/SUBJECT: Joint Policy Advisory Committee on Transportation (JPACT)

PERSONS ATTENDING: Members: Chair Rod Monroe, Jon Kvistad and Susan McLain, Metro Council; Earl Blumenauer, City of Portland; Gregory Green (alt.), DEQ; Roy Rogers, Washington County; Dave Lohman (alt.), Port of Portland; Royce Pollard, City of Vancouver; Bruce Warner, ODOT; Bob Post (alt.), Tri-Met; Bernie Giusto, Cities of Multnomah County; Rob Drake, Cities of Washington County; Gerry Smith, WSDOT; and Craig Lomnicki, Cities of Clackamas County

Guests: Steve Dotterrer, City of Portland; Dean Lookingbill, Southwest Washington RTC; Rod Sandoz, Clackamas County; Molly O'Reilly, Citizen; Kathy Busse, Multnomah County; Richard Ross, Cities of Multnomah County; Dave Williams, ODOT; G.B. Arrington, Tri-Met; Deb Wallace, C-TRAN; Jennifer Ball, Conkling, Fiskum & McCormick; Pamela Reamer-Williams and James Bailey, Intermodal Transportation Council; Peter Fry, Central Eastside Industrial Council; and Tom Coffee, City of Lake Oswego

Staff: Andrew Cotugno, Richard Brandman, Mike Hoglund, Tom Kloster, and Lois Kaplan, Secretary

SUMMARY:

The meeting was called to order by Chair Rod Monroe followed by an introduction and welcome for Commissioner Dick Thompson from Ellensburg, Washington.

Chair Monroe reported that Metro's Finance Committee had approved a resolution to refer the entire Construction Excise Tax package to the May ballot which will be considered by the full Metro Council at its October 13 meeting. This is intended to preempt any action by folks trying to refer only a portion of the package.

MEETING REPORTS

Councilor Kvistad moved, seconded by Councilmember Pollard, to approve the August 11 and September 8, 1994 Meeting Reports as written. The motion PASSED unanimously.
REGION 2040 RECOMMENDED ALTERNATIVE

Andy Cotugno noted that this meeting was dedicated to review of the 2040 Recommended Alternative that forms the framework and linkages relating to transportation policy. He reviewed the major transportation implications outlined in his memo.

Copies of the newsletter and the tabloid survey were distributed. Andy commented that distribution of the survey was made to everyone who participated in the 2040 process and everyone requesting to be on the mailing list.

The decision packet was included in two components: 1) a resolution acknowledging the overall description of the concept, the rationale behind it, and the analysis; and 2) the RUGGO amendments that contain a lesser amount of detail and will be adopted by ordinance.

The first goal being amended under RUGGO deals with process. The new requirements will be treated in the same manner as previous Metro plans. These represent objectives that Metro's plans must comply with and were brought about by the Metro Charter. Also discussed were implications of the map and background information relating to the Technical Appendix such as ridership and VMT/capita.

Also provided was a summary of the public information response to the tabloid and the open house. Andy noted that a JPACT amendment form was also included in the packet to help develop a set of positions following review and comment.

Commissioner Blumenauer noted that, at the last joint JPACT/MPAC meeting, a memo was distributed from six separate state agencies in the form of a position paper on the Concept Report and Preferred 2040 Alternative. The state agencies included: Housing and Community Services; Department of Land Conservation and Development (DLCD); Oregon Department of Transportation (ODOT); Department of Environmental Quality (DEQ); Department of Energy (DOE); and the Economic Development Department (EDD). Commissioner Blumenauer felt that JPACT should take advantage of the opportunity to integrate the state's comments in a more formal response that would be incorporated in the Appendix or a Memorandum of Understanding (MOU). He cited the importance of integrating what happens on the regional level with the state and pointed out that we would be helping the state, ourselves, and give the citizens a much more useful document if staff pursued linking that relationship. He felt it would foster better understanding and cooperation and would create a unique situation in the country. As part of the process, Commissioner Blumenauer
suggested incorporating the state's memo into the 2040 document to be ratified in addition to the signatories from the major state agencies. He wanted it formalized so that everyone could count on it.

John Fregonese provided an overview of the 2040 analysis. He noted that it began with RUGGOs and the decision of whether to grow up or out. He spoke of the process that involved the tabloid, the GIS system, and the analysis of the various growth concepts. He reviewed how Growth Concepts A, B and C were developed, how modeling was utilized, what we have learned from the models, and the public involvement process that followed. He spoke of a video that was available at Blockbuster Video, the ad campaign, and a mailer that drew 17,000 responses, 10,000 of which included additional comments. A summary of those comments is contained in the newsletter.

John reported that four specific questions were asked in the survey relating to: 1) a reduction of square footage of lots from 8,500 square feet to 7,000 square feet; 2) a reduction in parking; 3) higher density development where transit was provided; and 4) growth in centers. Using these four strategies, about 87 percent of future growth could be accommodated within the current Urban Growth Boundary and only 14,500 acres were added to the UGB, which he felt was rather conservative. A concept map summarizing the detailed analysis map was developed and population and jobs allocated.

John reviewed the elements of the Recommended Alternative which include neighbor cities; permanent greenbelts; greenspaces inside the UGB; 22,000 acres of urban reserves study area; higher density centers of employment; downtown Portland as the Central City (representing 20 percent of regional growth); Regional Centers (Milwaukie, Gresham, Beaverton, Washington Square and Clackamas Town Center, representing a tripling of density and 11 percent of new employment); Town Centers; corridors and nodes; and main streets.

Tom Kloster spoke of fine-tuning the Recommended Alternative as they applied it to the modeling. A basic network was put together based on Central City and Regional Centers, with an emphasis on transit, connectivity and creating a more dense network. He noted that some peak-hour congestion was tolerated. Through routes were emphasized on the highway system, minimizing access. Tom spoke of congested roadway miles (intra-UGB), a predominantly radial transit system, conserving the Central City and Regional Centers as hubs, parking factors, PEFs (pedestrian/environmental factors), transit vehicle hours, and total transit ridership. He emphasized that simply increasing transit service doesn't necessarily improve ridership. He noted that the
comparatively low congested roadway miles reflect the inclusion of major throughways, shorter trip lengths, and a jobs/housing balance. The Recommended Alternative has less transit service than the growth concepts but better ridership. Tom felt we did a better job of matching the system to the urban form we are trying to serve but it does not build more ridership.

Tom also noted that the effort focused on better connectivity for bike and pedestrian activities. He spoke of non-auto mode split and travel and that the VMT/capita total was one of the indicators in evaluating the system. He felt the results reflected what can be done with land use and costs associated with travel.

The regional decision timeline for Region 2040 includes: consideration of RUGGO amendments and a general description of the growth concept in December 1994; Urban Reserves in May 1995; The Regional Transportation Plan in summer 1995; Future Vision (the 50-year vision) in July 1995; and a draft Regional Framework Plan completed in summer of 1996 that would affect local government plans. John Fregonese noted that, over the next six months, decisions will be made over which areas should be defined as Town Centers or Regional Centers. He emphasized the importance of the land use pattern, noting that the Recommended Alternative is the most acceptable of all the concepts.

Mayor Drake suggested that the issue of accessibility to Gateway be investigated further in terms of it being considered a Regional Center. It was discussed that, when people go to work, they want to conduct the rest of their activities there as well, and the question was raised about whether that area could accommodate that kind of growth.

Councilor Giusto asked about the 30-minute commute and John Fregonese responded that most businesses locate based on auto accessibility.

In summary of the important transportation implications, Andy Cotugno stated that it is not a comprehensive transportation system being considered but there is need to recognize that the land use concept to be adopted will impact how transportation planning is done and how well it functions. He noted that land use decisions need to be added to the project decisions.

Andy Cotugno asked for feedback from Committee members as further guidance. Mayor Drake commented on the Western Bypass and accessing Sunset Corridor to I-5 and the issue of extending Murray Boulevard south to Tigard. He was curious whether Highway 217 could handle everything if the bypass wasn't put forward. Andy responded that a lot of streets would be impacted pending results of the bypass, that there will be further analysis, and
that those considerations will be addressed. He cited the impor-
tance of more street connectivity throughout the Murray area and
the fact that there will be some controversial discussions about
those segments.

Andy noted that TPAC is developing some comments for considera-
tion at its October 28 meeting. Similarly, staff is asking for
feedback from JPACT for guidance.

Metro Councilor Kvistad reported that the Planning Committee is
going into its series of "Listening Post" public hearings and
encouraged participation and involvement from Committee members.

Bruce Warner noted that ODOT will be interested in the neighbor-
ing cities issues and how the actions and reactions have impacts
on those surrounding cities. He felt it will have major impacts.
He cited the need for commitments on how they are going to grow
in the future, of tying together the funding for improvements,
and that it be done in a cooperative manner. Bruce cited the
need for additional sources of revenue to be explored.

Also discussed was the possibility and impact of two construction
projects being done simultaneously, expansion of Highway 217 and
the addition of light rail. Traffic is seriously congested in
the 217 corridor now and will be worse in the future. It was
noted that other modes and transit are needed. Councilor Monroe
felt that the addition of light rail along 217 could be planned
for at the same time as its expansion. Molly O'Reilly felt that
the biggest impact on 217 may be resolved by the connectivity of
local streets nearby. To be addressed is whether you get more
impact by improving connectivity due to local traffic. Molly
cited the importance of first analyzing the kind of traffic
before arriving at a solution.

Andy Cotugno encouraged attendance at the October 21 Oregon
Progress Board-sponsored Willamette Valley Conference in
Corvallis.

ADJOURNMENT

There being no further business, the meeting was adjourned.

REPORT WRITTEN BY: Lois Kaplan

COPIES TO: Rena Cusma
           Dick Engstrom
           JPACT Members
CONSIDERATION OF RESOLUTION NO. 94-2039 FOR THE PURPOSE OF AUTHORIZING EXECUTION OF A MEMORANDUM OF UNDERSTANDING (MOU) REGARDING CONFORMITY OF PORTIONS OF THE AIR QUALITY MAINTENANCE AREA OUTSIDE OF METRO'S BOUNDARIES

PROPOSED ACTION

Adoption of this Resolution would constitute Metro's approval of a Memorandum of Understanding (MOU) which describes the process of determining conformity with the State (Air Quality) Implementation Plan of transportation projects occurring outside Metro's boundaries but located inside the Oregon portion of the Portland/Vancouver Interstate Air Quality Maintenance Area (AQMA). To become effective, the MOU must also be approved by ODOT; DEQ; Clackamas, Multnomah and Washington Counties; the Cities of Banks, Gaston, and North Plains; and then by the Governor.

TPAC has reviewed this Memorandum of Understanding and recommends approval of Resolution No. 94-2039.

BACKGROUND AND FACTUAL ANALYSIS

The federal Clean Air Act has long required federal officials to assure that no project which receives federal assistance will impede attainment and/or maintenance of federal air quality standards. This aspect of the Clean Air Act is especially directed at federally funded transportation projects. However, the Clean Air Act and implementing regulations also prohibit local agencies from approving non-federally funded projects unless assurance is provided that air quality standards will not be adversely affected. This assurance is provided in a qualitative and quantitative "Conformity Determination" prepared by Metro. The Determinations assess transportation projects recommended in the RTP, and which are allocated funding in the TIP or which are proposed by local agencies, for their consistency with goals and programs established in Oregon State (Air Quality) Implementation Plan (SIP). Metro prepares a Determination when either the RTP or the TIP is amended to include or to remove projects of regional air quality significance or when local agencies propose such projects.

The MOU that is the subject of this Resolution is made necessary by a discrepancy between boundaries of the Portland/Vancouver Interstate AQMA and Metro's boundary. The Interstate AQMA boundary was established in the 1970's by DEQ and EPA. Metro's boundary was established by ORS 268 as amended by the Metro Charter approved by the electorate in 1992. The Interstate AQMA boundary includes portions of rural Clackamas, Multnomah and Washington Counties which lie outside Metro's boundary including the incorporated cities of Banks, Gaston and North Plains. The
issues addressed by the MOU are who is responsible for determining transportation project conformity in these rural Interstate AQMA areas and the procedures to be used for making the determination and for resolving any disputes.

The MOU is made necessary by a provision of the metropolitan planning regulations recently adopted by FHWA and FTA. Section 450.308(a) of the regulations specifies that, in the absence of an MOU resolving these issues, Metro will be responsible for carrying out all federal MPO planning requirements within the entirety of the larger Interstate AQMA boundary.

The MOU is included as Exhibit A of the Resolution. It clarifies that Metro already conducts most of the population, employment and transportation modeling work needed to conduct Conformity Determinations within the entirety of the Interstate AQMA. Metro performs these modeling tasks within the scope of work approved annually in the region's Unified Work Program (UWP). Metro will continue to perform the modeling tasks so long as the UWP continues to approve of such work and provide adequate funding for Metro's efforts.

The MOU would formally designate Metro as the entity responsible for determining whether emissions resulting from regionally significant projects occurring outside its boundary, but within the Interstate AQMA boundary, conform with emission budgets and other criteria established in the SIP. It specifies the procedures that would be used to prepare the Determination, including the definition of regionally significant projects requiring conformity analysis and importantly, new responsibilities of local governments and ODOT to report planned projects to Metro for analysis. Also addressed are consultation procedures and the mechanisms to be used in settling disputes, should any occur. Finally, it has a sunset provision and will expire at midnight, September 30, 1995, unless it is renewed by all signatories.

This MOU addresses only issues pertinent to the Oregon portion of the Portland/Vancouver Interstate AQMA. Transportation planning and air quality conformity in the Washington State portion of the Interstate AQMA are the responsibility of appropriate Washington State government entities.

Recommendation of the Executive Officer

The Executive Officer recommends adoption of Resolution No. 94-2039.
BEFORE THE METRO COUNCIL

RESOLUTION NO. 94-2039

FOR THE PURPOSE OF AUTHORIZING
EXECUTION OF A MEMORANDUM OF
UNDERSTANDING (MOU) REGARDING
CONFORMITY OF PORTIONS OF THE
AIR QUALITY MAINTENANCE AREA
OUTSIDE OF METRO’S BOUNDARIES

WHEREAS, The boundaries of the Oregon portion of the Portland/Vancouver Interstate Air Quality Maintenance Area (AQMA) were mutually agreed to by the Oregon Department of Environmental Quality (DEQ) and the federal Environmental Protection Agency (EPA) in the 1970's; and

WHEREAS, Metro's boundaries were established by Chapter 268 of the Oregon Revised Statutes and the Metro Charter; and

WHEREAS, Governor Straub designated Metro as the Portland metropolitan area planning organization (MPO) in 1979; and

WHEREAS, The Oregon portion of the Interstate AQMA does not comply with the federal air quality standard for Ozone; and

WHEREAS, Federal clean air legislation (the Clean Air Act) requires states to prepare State Implementation Plans (SIP's) for attainment and maintenance of federal air quality standards; and

WHEREAS, The Clean Air Act and implementing regulations require that transportation projects, whether or not they use federal funds and whether or not they are proposed in MPO transportation plans (i.e., the RTP) and improvement programs (i.e., the TIP), must demonstrate conformity with SIP's; and

WHEREAS, This conformity is established in Conformity Determinations prepared pursuant to federal regulations; and

WHEREAS, Metro prepares the Portland Area Conformity
Determination for approval by officials of the federal Department of Transportation; and

WHEREAS, Portions of the Oregon portion of the Interstate AQMA located in unincorporated portions of Multnomah, Clackamas and Washington Counties and in the rural incorporated cities of Banks, Gaston and North Plains fall outside Metro's boundaries; and

WHEREAS, The federal Metropolitan Planning Regulations (23 CFR Part 450) were jointly adopted by the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) in November, 1993; and

WHEREAS, The new regulations require that an agreement between the MPO, state air quality and transportation authorities and affected local jurisdictions must be signed by the Governor which defines how conformity with the SIP will be determined for regionally significant transportation projects planned to occur in those portions of the Interstate AQMA outside Metro's boundaries; and

WHEREAS, In the absence of such an agreement Metro is required by the new planning regulations to assume all transportation planning responsibilities for such areas; now therefore,

BE IT RESOLVED,

1. That the Metro Council authorizes execution of a Memorandum of Understanding included in this Resolution as Exhibit A, which would specify how conformity with the SIP will be determined for both locally and federally funded, regionally
significant transportation projects planned in those portions of the Interstate AQMA outside Metro's boundaries.

2. That ODOT, DEQ, Tri-Met, and Clackamas, Multnomah and Washington Counties, and the cities of Banks, Gaston and North Plains will each also need to approve this MOU for it to become effective.

3. That upon approval by each party listed in the MOU, Metro staff is authorized to recommend the MOU to the Governor for approval.

4. That Metro staff is authorized to take such other action as may be needed to see that, upon final approval by the Governor, the MOU is submitted to the appropriate FHWA and FTA officials.

5. That this Memorandum of Understanding will expire at midnight, September 30, 1995, unless renewed by all signatories.

ADOPTED by the Metro Council this ___ day of ________, 1994.

Judy Wyers, Presiding Officer
This Memorandum of Understanding is executed pursuant to the Metropolitan Planning regulations contained in 23 CFR Part 450.310(f) which state:

"If the metropolitan planning area does not include the entire nonattainment or maintenance area, there shall be an agreement among the State Department of Transportation, State air quality agency, affected local agencies, and the MPO describing:

[A] The process for cooperative planning and analysis of all projects outside the metropolitan planning area but within the nonattainment or maintenance area.

[B] The agreement must also indicate how the total transportation related emissions for the nonattainment or maintenance area, including areas both within and outside the metropolitan planning area, will be treated for the purpose of determining [SIP] conformity...

[C] The agreement shall address policy mechanisms for resolving conflicts concerning transportation related emissions that may arise between the metropolitan planning area and the portion of the nonattainment or maintenance area outside the metropolitan planning area."

This situation occurs in the Portland area. The Metro MPO boundary does not encompass portions of the Portland/Vancouver Interstate Air Quality Maintenance Area (AQMA) which is in nonattainment status with respect to the National Ambient Air Quality Standards for Ozone established in the Clean Air Act Amendments of 1990 (hereafter, "rural AQMA area"). The rural AQMA areas of concern are depicted in Attachment 1 to this Memorandum, and encompass portions of unincorporated Clackamas, Multnomah and Washington Counties (the Counties) and the incorporated cities of Banks, Gaston and North Plains in Washington County (hereafter, the Cities). (It should be noted that the region is also in non-attainment for Carbon Monoxide. However, the boundary of the Oregon portion of the maintenance area for Carbon Monoxide is the same as the MPO boundary and is therefore not germane to this MOU.)

Under 23 CFR Part 450.308(a), a formal agreement must be approved by the Governor sanctioning an MPO boundary that is less than the AQMA boundary and which specifies the manner in which requirements of Part 450.310(f) (above) will be addressed. In the absence of such an agreement, Metro is required to implement all the metropolitan planning requirements identified in Part 450 for both rural AQMA and MPO boundary areas.
Metro has historically accounted for transportation facilities included in the entirety of the three counties, including those portions outside the MPO boundary but falling within the AQMA boundary, to ensure accuracy of its regional transportation model. Metro has also historically accounted for population and employment data within the entirety of the three Counties (and Yamhill and Clark Counties as well) for similar reasons. Metro shall continue to undertake these analyses contingent upon their continued identification as work items in the Unified Work Program and the availability of adequate planning funds.

Metro prepares the Portland Metropolitan Area Conformity Determination pursuant to 23 CFR Part 450.324(b), and consults with the Oregon Department of Environmental Quality (DEQ) regarding details of these Determinations. In the last four years in which Conformity Determinations have been required, Metro’s analysis has included all regionally significant projects proposed within the entire Oregon portion of the Interstate AQMA. The MOU ratifies continuation of this practice.

Air quality matters affecting that portion of the Interstate AQMA in Washington State, including conformity of transportation related emissions with Washington State’s SIP, are entirely the responsibility of Washington State governmental entities and are not addressed in this MOU.

A. **Cooperative Planning and Analysis Process**

1. Transportation system planning in rural AQMA areas shall be the joint responsibility of ODOT, the Cities and the Counties, with facility ownership establishing specific project-level responsibility as is currently the case. Demographic assumptions used in the planning process, both historical and projected, shall rely upon Metro’s regional forecasts. Metro shall be responsible for transportation system planning (pursuant to the federal Metropolitan Planning Regulation) within its established boundaries which, it is agreed, shall be less than the boundaries of the Oregon portion of the Interstate AQMA unless otherwise amended pursuant to applicable state law. This declaration is responsive to 40 CFR Part 308(a).

2. ODOT Region 1, the Cities and the Counties are responsible for declaration to Metro of planned, regionally significant transportation projects proposed for implementation in rural AQMA areas. Failure to declare such projects to Metro shall cause the projects to be omitted from Metro’s regional emissions analysis. Under Section 176(c)(2)(C) of the Clean Air Act, "a transportation project may be adopted or approved by a metropolitan planning organization or any recipient of funds designated under Title 23 U.S.C. or the Urban Mass Transportation Act... only if it comes from a conforming transportation plan and TIP."

Federal authorities interpret this section of the Clean Air Act to mean "projects must be included in a regional emissions analysis which demonstrates that the plan and TIP..."
would still conform if the project were included." (Federal Register, Vol. 58, No. 225, p. 62204, November 24, 1993) Local agency approval of any regionally significant transportation project not analyzed in Metro’s regional emissions analysis, whether the project were federally or non-federally funded, would constitute a violation of the Clean Air Act and the Oregon State Implementation Plan. Such approvals could cause federal authorities to sanction the transportation program of the entire Portland area.

Therefore, upon discovery that a federally or non-federally funded, regionally significant transportation project in the rural Interstate AQMA area has not been assessed for conformity with the SIP, parties to this agreement shall withhold right-of-way and construction funding until the project shall have been included in a regional emissions analysis prepared by Metro.

3. Project declarations shall specify both when facility construction and operation are expected relative to "analysis years" adopted in the MPO Conformity Determination. For the FY 1995 Portland Metropolitan Area Determination, these years are 1995, 1996, 2000 and 2010. Metro, in consultation with DEQ, shall notify ODOT and the Cities and Counties of changed analysis years which may be adopted from time to time.

4. Project declarations shall define project design concept, scope and phasing sufficient to permit analysis of air quality impacts and, to the extent feasible, shall provide estimates of cost and source(s) of committed and/or anticipated revenue. The intent of revenue declarations is that only projects assured of funding, and thus of construction, shall be modeled. The interpretation of engineering specifications for purposes of defining system modelling parameters shall be conducted by Metro staff pursuant to reasonable professional practice and in consultation with project sponsors.

5. Prior to EPA approval of the State’s Air Quality Conformity Rule (currently in development pursuant to 40 CFR Part 51 and 93), a regionally significant project occurring within a rural AQMA area shall have the meaning defined in 40 CFR Part 51.392, as augmented by the list of exempt projects contained in Part 51.460 and 51.462, or such other definition as may be agreed to in consultation between Metro, ODOT, and DEQ. After EPA approval of the State Rule, the meaning shall be as defined in the Rule, or as may be defined in the process of consultation provided for in the Rule. Metro’s consultation with DEQ regarding rural Interstate AQMA area projects selected for analysis shall occur at the same time as Metro’s consultation with DEQ regarding overall system definitions used in making Conformity Determinations pursuant to 40 CFR Part 51.402(c).

6. Prior to EPA approval of the State Conformity Rule, the threshold for project significance within the MPO boundary shall continue to be the more rigorous standard of "typical inclusion in Metro’s regional transportation model," or such other standard
as may be adopted by Metro after consulting with DEQ. After EPA approval of the
Rule, the definition shall be as defined in the Rule, or as may be defined in the
process of consultation provided for in the Rule.

B. Treatment of Emissions Forecasts

1. Emissions resulting from regionally significant projects occurring both inside and
outside of the MPO boundary shall be computed by Metro in a combined quantitative
analysis meeting requirements of the 40 CFR Part 51 and 93 SIP Conformity
regulations. The computation shall also sub-quantify emissions attributable to both
the rural and MPO portions of the AQMA. The combined emission estimate shall be
used as the basis for determining whether, on the basis of the region's phased air
quality attainment status:

   a. Total mobile source emissions are less in the milestone years than in 1990 or
      such other base year as may be adopted from time to time; and

   b. Total mobile source emissions are less in each milestone year assuming
      implementation of the proposed regionally significant projects, than would
      occur without their implementation; and/or

   c. Total emissions fall below the mobile source emission budget as may be
      specified in the Attainment SIP revision mandated by 40 CFR Part 51.

C. Conflict Resolution in the Event of Nonconformity

1. Quantification of emissions attributable to regionally significant projects will result in
the TIP and/or RTP either passing or failing the above described "build/no build"
and/or emission budget tests. In the event of a failure of any of the three tests,
ODOT, Metro, the Counties, the Cities, Tri-Met and DEQ will cooperate in defining
actions outside the metropolitan boundary necessary to achieve conformity of
proposed projects with the SIP. The JPACT/Metro Council process will be relied
upon to identify TIP/RTP amendments needed to demonstrate SIP conformity of
projects occurring within the metropolitan boundary. Appropriate amendments or
actions may include deletion of highway expansion projects, programming of
transportation control and/or demand measures or a combination of these two
approaches.

2. To the extent that deletion of highway expansion projects is pursued to demonstrate
conformity, due weight in the selection process shall be given to the relative
contribution of rural AQMA area emissions relative to MPO-area emissions.
Countervailing considerations may include safety and preservation benefits of
modernization proposals together with such other technical and administrative criteria
as may be deemed appropriate by a majority of the Metro, County, ODOT and DEQ
representatives. Should a project occurring within one of the Cities be proposed for
deletion, the affected city shall have one vote in the cooperative process in actions
regarding the project.
To the extent that programming of new transportation control and/or demand measures is pursued to demonstrate conformity, the selection of such measures shall be made by the MPO for reductions within the MPO portion of the AQMA, pursuant to 23 CFR Part 450.312(c), and by ODOT and/or Tri-Met, the Cities and the Counties for reductions attributable to rural AQMA areas. DEQ shall be consulted regarding the methodology employed by Metro for crediting of emission reductions attributable to all such measures as may be committed to by either the MPO, ODOT and/or Tri-Met, the Cities and the Counties.

The provisions of this MOU shall expire at midnight, September 30, 1995, unless renewed by all signatories. In the event this MOU (or an MOU substantially similar) is not renewed, an alternative approach for determining conformity shall be established.

Agreed to this ______ day of ____________________, 1994.

Rena Cusma
Executive Director, Metro

Donald Forbes
Director, ODOT

Lydia Taylor
Interim Director, ODEQ

Beverly Stein
Chair
Multnomah County Comm.

Ed Lindquist
Chair
Clackamas County Comm.

Bonnie Hays
Chair
Washington County Comm.

Tom Walsh
General Manager
Tri-Met

Barbara Roberts
Governor
State of Oregon

Howard Steinbach
Mayor
City of Banks

Brett Costelloe
Mayor
City of Gaston

Robert Kindel, Jr.
Mayor
City of North Plains

Rod Monroe
Chair
JPACT
November 2, 1994

To: Metro Council
    JPACT
    MPAC
    Metro Planning Committee

From: Brent Curtis, Planning Manager

Subject: REGION 2040 - TRANSMITTAL OF WASHINGTON COUNTY BOARD OF COUNTY COMMISSIONERS' TESTIMONY

On November 1, 1994, the Washington County Board of Commissioners (Board) discussed at its public meeting the Region 2040 Recommendation. The Board authorized and directed me to transmit their recommendations and comments regarding Region 2040.

Please find attached the required forms for amendment considerations. Also please note the Board has provided two sets of recommendations:

A. The majority of the Board represented by Chairman Hays, Commissioners Christy and Katsion; and

B. A minority recommendation/comment by Commissioner Peters.

Please note Commissioner Rogers was not available for the Board action.

cc: Board of County Commissioners
    Charles Cameron, County Administrator

BC/lt

(j: bc-mpac.d)
To: Metro Council
    Metro Planning Committee
    MPAC
    JPACT

From: Board of County Commissioners

Subject: RECOMMENDATION: REGION 2040 RECOMMENDED ALTERNATIVE

The Metro Council, the Metro Executive and the Metro staff are to be commended for their commitment in undertaking the Region 2040 process, their commitment to detailed, sophisticated technical analysis, and the high priority they placed upon public information and public involvement as a significant contributor to the Region 2040 planning process.

The Metro Executive's Region 2040 Recommended Alternative is also to be commended for its synthesis of a broad range of alternatives, public opinions and very technical policy imperatives into a long range urban form which depends upon greater land use efficiencies and densities served by a truly multimodal transportation system.

Washington County is in agreement with the general growth concept as described in the Executive Recommendation. We support the distinction between urban and rural lands and the need to reduce sprawl. We agree with the bolstering of mixed use centers inside the urban growth boundary and recognize the important role they serve in the Growth Concept. We also support the mix of housing and employment in compact areas that are accessible to transit.

We recognize how important the Region 2040 decision is to Washington County and have spent considerable time working with Metro staff on the Region 2040 project. Likewise, Washington County has put considerable effort into coordinating technical and policy analysis through work with the Washington County Coordinating Committee, the Washington County Managers Group, the Washington County Planning Directors Group, and the Washington County Public Officials Caucus.

Washington County is supportive of the policy direction and approach of the Metro Executive's Region 2040 Recommended Alternative. Our support comes with the following recommendations:
1. Washington County supports the philosophy of greater land use efficiencies in
development and redevelopment with a focus on centers and corridors for
organizing such greater land use efficiencies. Washington County supports
also the resultant need for relatively fewer land additions to the UGB and a
more rigorous urban growth management process.

2. Washington County recommends a three step adoption-refinement-readoption
process which would provide for Metro decision-making in December, 1994;
June, 1995; and December, 1996 (please refer to Attachment One). The
second and third steps of the three step process should be viewed as
refinement opportunities. The three step adoption-refinement-readoption
process would be tied closely to a carefully defined work program describing
priority planning analysis necessary to ensure timely decision-making while
ensuring sufficient local government review and participation time.

3. Washington County recommends additional regional and local government
analysis regarding the feasibility of achieving the land use efficiencies, densities
and degree of redevelopment the Recommended Alternative assumes, prior to
formal adoption as a binding land use ordinance. Washington County
recommends the adoption of the Regional Growth Concept and associated
regional planning lexicon by resolution in December, 1994. Likewise,
Washington County recommends adoption of the Region 2040 Growth Concept
Map by resolution in December, 1994. Adoption by resolution will clearly mark
the Metro Council's Region 2040 decision as a timely resolution of two years of
planning while remaining open to additional analysis which will refine and
sharpen the concept for readoption as recommended in the three step
adoption-refinement-readoption process.

4. Washington County recommends adoption of the Growth Concept and Growth
Concept Map by resolution for two additional reasons:

A. Many local governments have requested additional time to undertake
local technical and public review of the Recommended Growth Concept
and Map. Adoption by resolution, coupled with a work program and the
recommended three step adoption-refinement-readoption process would
serve to respond to the requests from local government and Metro's
LCDC Goal 2 coordination responsibilities.

B. The Metro planning analysis and public attention has focused upon
alternatives analysis which compares, contrasts and generally instructs all
involved in the performance of one alternative as compared to another.
This analysis has focused upon preparing a recommended alternative.
The Recommended Alternative needs a more formal and detailed
planning and legal analysis regarding the conformance of the
Recommended Alternative with the Oregon Revised Statutes, the LCDC
Goals and associated Oregon Administrative Rules, relevant case law, federal requirements, the RUGGOs and the RTP. It is inappropriate to adopt by ordinance and as a land use decision a growth concept and map absent detailed findings and conclusions regarding compliance with all relevant state and regional planning requirements.

5. Washington County recommends, immediately following the December, 1994 resolution adoption, additional technical analysis and public review be undertaken to determine the feasibility and required policies necessary to ensure the Region 2040 Recommended Concept and Map is achievable. The Recommended Concept and Map depends upon substantial infill and redevelopment to create a much more efficient use of existing urban lands. The degree to which such an approach is successful will dictate the extent to which additional lands will need to be added to the UGB. The additional analysis during the second step refinement phase of the recommended three step process, will provide an opportunity to define in a much more precise way the need for additional urban land as required by Goal 14. It is inappropriate to decide in a formal, precise and definitive manner the amount of land needed for addition to the UGB until greater certainty is attained regarding infill and redevelopment.

6. Washington County supports the recommendation to narrow to a defined set of lands for inclusion as Urban Reserve Study Areas. Washington County recommends support of judicious inclusion or exclusion of additional land to the Urban Reserve Study Area as may be recommended and justified to Metro by local government and the public during the current adoption process. The Urban Reserve Analysis should be conducted in an expeditious manner leading to final Urban Reserve determination and designation within six months. The analysis should be conducted simultaneously with the infill and redevelopment analysis and refinements.

It is further recommended that the analysis determine how much farm land needs to be maintained in order to assure the continued viability of the agricultural economy, including agricultural suppliers, agricultural processors, and providers of farm equipment. Final designations of urban reserves must be based upon data that permit decision makers to balance conflicting identified needs for both urban and agricultural land.

7. The Rural Reserve concept should be amended to conform with the prior "Greenbelt-Green Corridor" concepts associated with maintaining permanent "green" non-urban separation between the existing urban area and surrounding neighboring urban areas. The Rural Reserve concept lacks the more strategic and focused policy imperative of the "Greenbelt-Green Corridor Concept."
8. Washington County strongly supports the Growth Concept's two premier transportation policies:

A. To develop a true multimodal transportation system to serve land use patterns, densities and community designs which allow for and enhance transit, bike and pedestrian travel opportunities; and

B. Jobs-housing balance at the regional level, county level and community level.

9. Washington County notes the land use and transportation systems for central and eastern Washington County currently produce inadequate mobility. This area requires continued analysis and system adjustments to ensure adequate transportation system performance. Washington County recommends central and eastern Washington County be noted as a Study Area on the Concept Map and text. Additional study is required to develop an adequately performing transportation system to match the proposed land uses. It may be necessary to modify the proposed land uses and location of design elements should development of an adequate transportation system become impossible.

10. Washington County recommends the Metro staff be directed to prepare and deliver draft Year 2020 population and employment projections/allocations. In addition to refining the Region 2040 Concept in Step Two of the three step adoption-refinement-readoption process, the Regional Transportation Plan, subsequent local transportational system plans and conforming local government land use plans require a twenty year planning horizon as compared to the 40+ year planning horizon of Region 2040. It is imperative for timely completion of such plans to begin to develop Year 2020 population and employment allocations.

11. The Step Two refinement planning process should continue to examine and refine planning analysis and conclusions regarding industrial lands. Additional analysis and consideration regarding the relative importance of industrial land in providing employment opportunities is required. Likewise, additional consideration of industrial land and the degree such lands may be over- or under-designated in the Concept will contribute to a necessary refinement in the amount of land needed for urbanization.

12. Washington County recommends that Metro involve representatives of School Districts in the Region 2040 planning process. It is important that Metro take into serious consideration the ability of schools to accommodate and/or plan for projected increases in student enrollments.

13. Washington County recommends the Metro staff prepare, and the Metro Council adopt, a detailed work program consistent with the recommended three
step adoption-refinement-readoption process. The work program should detail planning analysis and local government and public review opportunities for

- Urban Reserves
- Regional Transportation Plan
- Future Vision
- Regional Framework Plan

14. Washington County recommends the RUGGOs and Region 2040 develop and include a monitoring system, specific performance indicators and a systematic review process.

15. Washington County recommends the following language be appended to the third paragraph defining Regional Centers in the proposed RUGGO amendments (page 39):

   Each Regional Center will be unique, exhibiting its own characteristics and responding to varying market and local needs. The amount and specificity of development will vary between Regional Centers, reflecting the diversity of function and location.

16. Washington County recommends the following language be appended to the second paragraph defining Town Centers in the proposed RUGGO amendments (page 39):

   Each Town Center will be unique, exhibiting its own characteristics and responding to varying market and local needs. The Regional Framework Plan will reflect this diversity in establishing Town Center guidelines.

17. Washington County recommends the following language be appended to the paragraph defining Corridors in the proposed RUGGO amendments (page 39-40):

   Corridors will have varying characteristics throughout the region. The Regional Framework Plan will reflect these differences in the establishing of Corridor guidelines.

18. Washington County recommends the following language be inserted into the paragraph defining Industrial Areas in the proposed RUGGO amendments (page 41):

   Industrial Areas would be set aside exclusively for industrial activities and non-residential supportive activities required by industrial uses.
19. Washington County recommends the following language be inserted into the paragraph defining Collectors and local streets (page 43):

   The RTP should consider a minimum standard of eight to ten through streets per mile except along regional through streets, applied to developing or undeveloped areas to reduce local travel on arterials.

Specific "2040 Growth Concept" Map Changes:

20. Washington County recommends that three additional Urban Reserve Study Areas be included (please refer to Attachment Two);

   1. Evergreen West area
   2. Elsner Road / Beef Bend Road area
   3. St. Mary's Property

21. Washington County recommends modification of three of the identified Corridors to reflect the alignments of future or existing roadways as designated on the Washington County Transportation Plan Functional Classification System map;

   1. Cornell Road between Cornelius Pass Rd. and Stucki Ave. (future)
   2. Springville Road (existing)
   3. Barnes Road west of Cedar Hills Blvd. (future)

22. Washington County recommends deletion of five of the identified Corridors. These corridors are located along arterials in primarily residential areas that are substantially developed and provide very limited opportunities for future development and increased densities;

   1. Garden Home Road
   2. Bethany Boulevard between Sunset Highway and West Union Rd.
   3. Boones Ferry Road south of Sagert Rd.
   5. Scholls Ferry Road between Washington Square and Beaverton-Hillsdale Highway

23. Washington County recommends the deletion of portions of two identified main streets. These streets are arterials with traffic volumes in excess of those that would allow for the development of slow traffic, pedestrian friendly environment presumed in the main street concept;

   1. Cornell Road between 143rd Ave. and Barnes Rd.
   2. Farmington Road west of Murray Blvd.
24. Washington County recommends the addition of two main streets which, due to what we believe to be a mapping error, are not clearly identified on the "2040 Growth Concept" Map;

1. N. Adair Street between 19th Ave. and 9th Ave. (Cornelius)
2. Pacific Avenue between Douglas Ave. and Main St. (Forest Grove)
ATTACHMENT ONE

MTAC RECOMMENDED ADOPT-REFINE-READOPT PROCESS

STEP ONE

DECEMBER 1994 (2040)
CONCEPT MAP
URBAN RESERVES STUDY AREA
RUGGO TEXT (% of growth)
URBAN RESERVE STUDY AREA
DENSITIES BY PLAN CATEGORY
2020 POP/EMP NUMBERS
WORK PROGRAM

STEP TWO

JUNE 1995 (2040-2020)
URBAN RESERVES
REGIONAL TRANSPORTATION PLAN (RTP)
DENSITIES BY PLAN CATEGORY
CONCEPT MAP (revisions)
FUTURE VISION
GOAL II RUGGO (% of growth)
ADOPT WORK PROGRAM FOR REGIONAL FRAMEWORK PLAN (RFP)
URBAN GROWTH BOUNDARY (if necessary)

STEP THREE

DECEMBER 1996 (2020)
RFP DRAFT (6/96)
JURISDICTION SPECIFIC TARGET SPECIFIC STANDARDS FOR ITEMS OF "METROPOLITAN CONCERN"
Washington County
Geographic Information System

Sheet 1 of 3

Proposed Additional Urban Reserve Study Areas

- Proposed Urban Reserve Study Area
- Existing Approx. Urban Reserve Study Area
- Proposed Tualatin River NWR

INFORMATION SOURCES

TAXLOT MAP
Cities of Beaverton and Tigard:
Map accuracy - control point positional accuracy is plus or minus five feet or better.
Data collection scale - 1"=100'

Remainder of region:
Map accuracy - Unknown.
Data collection scale - 1"=100', 1"=200' or 1"=400'

Note: Washington County Assessment & Taxation is continually updating the taxlot base maps. Some of the areas displayed in this map may have taxlots created after Aug. 27, 1994.

All data compiled from source materials at different scales. For more detail, please refer to the source materials or Washington County Department of Land Use and Transportation.

October 27, 1994
Proposed Additional Urban Reserve Study Areas

- Proposed Urban Reserve Study Area
- Existing Approx. Urban Reserve Study Area
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October 27, 1994
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Proposed Urban Reserve Study Area
Existing Approx. Urban Reserve Study Area
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October 27, 1994
November 2, 1994

To: Metro Council
Metro Planning Committee
MPAC
JPACT

From: Linda Peters, Commissioner

Re: REGION 2040 RECOMMENDATIONS: MINORITY REPORT

I join the majority of the Board in strongly supporting the growth concept embodied in the Region 2040 Recommended Alternative. I concur with the introductory paragraphs and numbered recommendations 1, 8, 10, 11, 12, 13 and 14 adopted by majority vote of the Washington County Board of Commissioners at yesterday's meeting.

This report is intended to draw attention to two issues which I believe should inform further deliberations on the specific amendments recommended by the Board majority; to raise objections regarding the proposed Urban Reserve Study Area additions; and to comment briefly on several other specific recommendations.

First: These recommendations reflect a very limited public process, principally involving Washington County Land Use staff, elected city officials and planners. While such a "team" approach has much to recommend it, the team did not include several other major Washington County stakeholders. Input from organizations representing citizens outside of cities -- CPO's, the Farm Bureau, etc. -- was not systematically solicited or incorporated into the drafting of these "Washington County" recommendations.

Second, a substantive concern: We must learn how much productive farm land can be converted to urban use without damaging the region's agricultural economic base. This proposal appears in the majority report as the second paragraph of recommendation #6. I proposed this addition to the staff-prepared draft, and I commend my fellow commissioners for approving it.

I raise the issue again here to emphasize its importance as the key missing half of a balanced decision-making process. I'm told that Metro has begun discussion, if not formal study, of the potential impact of farm-to-urban conversions on the viability of remaining ag businesses and the multi-county farm production they currently
serve. In my view, it's critical that all the partners to decisions about Urban Reserves (and ultimately about Boundary changes) must have reference to data that show both farmland needed to maintain an ag economy and urban land needed to accommodate projected growth. Knowing this, we can thoughtfully balance conflicting needs.

Third, majority recommendation #20 regarding additions to Urban Reserve Study Areas: In general, we should be conservative in identifying Urban Reserve Study Areas because of the point raised above, and because it seems a waste of public resources to study areas that we're pretty sure will fall out under close scrutiny and/or determined opposition.

1. The Evergreen West area, while a popular cause with many Hillsboro-area business and city leaders, is both prime farmland and in the Hillsboro Airport flyway. Not a good prospect for potentially conflicting urban development.

2. Likewise, the Elser Road/Beef Bend Road area has long been controversial in connection with Western Bypass proposals; the opposition to urbanizing that particular farming area is extremely strong and well-organized; I would argue strongly against including it as an Urban Reserve Study Area on both logical and practical grounds.

3. There is more reason to include the entirety of the St. Mary's property -- some of it is already identified, the proposed full-site development would be transit-oriented, mixed use, including affordable housing, the sort of urban design I encourage -- but it also has a history of strong, effective citizen defense against previously proposed urban uses. Iffy.

Finally, my comments on other specific recommendations contained in the majority report:

Majority recommendations 2-5 call for considerable additional study focused on the feasibility of compact, higher density urban design, and in general push for a strong local government role in making final Urban Reserve decisions. I would advocate a more enthusiastic, proactive County commitment to make the preferred alternative work. We can build that commitment as we work through the design issues with our various governmental, citizen-group, and private industry partners. And if all parties know what we are risking when we urbanize farmland, perhaps we can more readily find support for urban design solutions that will, community by community, help us accommodate higher densities and protect our livability.
6. Urban Reserve Study Areas, decisions and timing: If we don't have the farm-economy-impact data we need within six months, we shouldn't be making the decisions within six months.

7. Rural Reserve vs. Greenbelt-Green Corridor concepts: If we know how much productive farmland we need to protect where in order to sustain a viable ag economy, we'll know whether we need major Rural Reserve areas or merely Green Corridors. I suspect it will be the former.

9. Here too I would offer a more proactive County role. With committed, creative leadership from Metro and Washington County, we can work cooperatively with Tri-Met, cities, the business community, and neighborhoods to develop an adequately performing transportation system.

15. - 18. I'm not sure what the proposed language accomplishes that isn't adequately covered elsewhere; certainly the preservation of diverse local character, the sense of place in our communities, is one of the fundamental principles underlying the whole Region 2040 process.

19. What would be the implications of the proposed insertion? Regional through streets with limited access? How does that serve to reduce local travel on arterials?

21 - 24. These may or may not be good recommendations, but they seem to be aimed at reducing change to existing patterns. I expect that there will be changes -- certainly to the current Washington County Transportation Plan, which is out of date and much in need of revision -- based on Region 2040 and subsequent Metro planning decisions. I also expect that these decisions will be informed by much neighborhood input as well as by input from cities and the County.

The Washington County Board has not conducted hearings or otherwise heard from non-governmental stakeholders on the subject of the proposed road alignments, Corridor and Main Street changes. I encourage Metro to look beyond the majority report recommendations for guidance in making 2040 Growth Concept Map Changes.
To: JPACT members and interested parties

From: Andrew C. Cotugno, Chairman, TPAC

Date: November 3, 1994

Subject: TPAC Recommendations on Region 2040

Attached are recommendations on Region 2040 transportation related comments from TPAC. Attachment 'A' includes proposed JPACT consent items that address less significant issues identified in TPAC's comments; Attachment 'B' includes JPACT discussion items of key issues identified by TPAC. The comments are arranged by the following categories:

1. Roadways
2. Transit
3. Bicycle & Pedestrian
4. Freight & Intermodal Facilities
5. Future Analysis & Policy Issues
6. Land Use

We have responded to all transportation-related items and made some transportation comments on a limited number of land use items. The attachments contain specific recommendations for change to the Concept Map and the text contained in the Recommended Alternative Decision Kit. Each proposed change is numbered and includes: (a) a brief description of the proposed change; (b) the source of the comment; and (c) the TPAC recommendation. Proposed text additions are underscored; recommended deletions are shown with a strike. Where Metro staff and TPAC differ in their recommendations, both are shown.

Another packet of land use-related comments is under review by MPAC. It is scheduled to be acted upon by MTAC on November 3, and MPAC on November 9. We will provide a copy of their recommendations at the JPACT meeting.

In an attempt to streamline the JPACT review process and conserve paper, we have not included copies of the actual comments presented to TPAC. However, copies of the original comments are available upon request.
ROADWAYS

1. Comment: Need to emphasize multi-modal function in transportation terminology on centers and corridors (O'Reilly).

2. Comment: The term "highways" should be replaced with "multi-modal" or "auto/truck" routes, whichever is applicable (O'Reilly).

3. Comment: Access management should be a component of all roadway planning (ODOT; City of Portland).

TPAC Recommendation on Comments 1-3: Agree; recommend adopting the following revisions:

• revision to the last sentence of the last paragraph on page 38 of the RUGGO document:

"Improvements to the transit system network, development of a multi-modal street system and maintenance of regional through-routes [the highway system] would provide additional mobility to and from the city center."

• revise second paragraph on page 39 of the RUGGO document:

"...Regional Centers would become the focus of compact development, redevelopment, and high-quality transit service, multi-modal street networks and act as major nodes along regional through-routes and highway improvements.

• insert new second sentence and revise portions of the third paragraph on page 39 of the RUGGO document:

"...to the Central City. A dense network of multi-modal arterial and collector streets would tie regional centers to surrounding neighborhoods and other centers. Regional through-routes would be designed to serve and
connect regional centers, and Highway improvements also should focus on ensuring ensure that these centers are attractive places to conduct business."

- insert new introductory language proposed by City of Portland as a new third paragraph on page 42 of the RUGGO document:

  In addition to the traditional emphasis on road and transit facilities, the development of networks for freight travel and intermodal facilities, bicycle and pedestrian networks as well as the efficient use of capacity on all streets through access management and congestion management and/or pricing will be part of a successful-transportation system.

4. Comment: Recommend the following revisions to the regional through-routes discussion on page 42 of the RUGGO amendments (City of Gresham):

  "...move people and goods around the region, and connect regional centers and the Central City, and connect the region to the statewide and interstate transportation system.", and

  "...are attractive to business. However, when while they serve as an appropriate a location for auto-oriented businesses, the primary function of these routes, to move regional and statewide traffic, can be eroded. They..."

TPAC Recommendation on Comment 4: Agree. Recommend revisions as proposed.

5. Comment: Examples of multi-modal facilities should not be Macadam and B-H Highway (O'Reilly).

TPAC Recommendation on Comment 5: Agree; delete second sentence from Corridors discussion on page 39 of RUGGO document.

6. Comment: Need more discussion of potential impact to eastern Washington County transportation system, as indicated by modeled congestion levels in the Recommended Alternative (City of Beaverton).

TPAC Recommendation on Comment 6: Disagree; a detailed analysis of the regional transportation system is inappropriate at this time, and will occur as part of the RTP update.

7. Comment: Show Highway 47 Bypass route on Concept Map (City of Forest Grove).

TPAC Recommendation on Comment 7: Agree. Recommend revision to the Concept Map.
8. Comment: Why not include the Western Bypass in the concept, since other Access Oregon Highway (AOH) projects were included (Greater Hillsboro Chamber).

TPAC Recommendation on Comment 8: Disagree; the first leg of the bypass, known as the I-5/99E connector, was included because it clearly served as an important through-route to Newberg, one of the neighbor cities assumed to experience significant growth in the Recommended Alternative. The remaining sections of the Western Bypass were not included because they did not complement the urban form of the Recommend Alternative -- much of the route is outside the proposed urban area. As an alternative to the bypass in the urban area between Tualatin Valley Highway and Highway 26, the growth concept includes a number of north/south arterial and collector street connections. However, the findings in the analysis (page 15 of the Decision Kit) already point out the need to further study freight and rural travel demand within the corridor, and the need for travel improvements within the Highway 217 corridor.

TRANSIT

9. Comment: Should evaluate additional transit service to determine if additional ridership in Recommended Alternative would occur (Tri-Met).

TPAC Recommendation on Comment 9: Agree; further refinement of the transit system will be modeled as part of the RTP update. The transit system modeled in the Recommended Alternative will provide a valuable starting point for development of an RTP network, as well as Tri-Met's PTN study. The work plans for both projects are such that the Recommended Alternative transit modeling will be both timely and appropriate in scope. In addition, the following language should be included as a third introductory paragraph under "Transportation" on page 42 of the RUGGO document:

While the Concept Map shows only major transit facilities and corridors, all areas within the UGB have transit access. Transit service in the Growth Concept included both fixed-route and demand-responsive systems. The RTP shall further define the type and extent of transit service available throughout the region.

10. Comment: Need to establish a mechanism for refining corridor locations (Clackamas County; Washington County; City of Beaverton).

TPAC Recommendation on Comments 10: Agree; corridor adjustments and other refinements to the growth concept will be considered prior to final adoption of the Recommended Alternative. Corridors will also be further
refined as part of the RTP update. Concur with MTAC recommended time frame of six months for growth concept refinements.

11. Comment: Include routes like Powell in HCT system if routes like Forest Grove extension are included (Tri-Met).

12. Comment: Include HCT extension to Damascus from CTC (Clackamas County).

13. Comment: Include HCT extension from Lake Oswego to Durham Road/I-5 interchange (Clackamas County).

TPAC Recommendation on Comments 11-13: Disagree; the modeling for the various growth concepts showed that LRT on Powell drew a significant amount of ridership from the McLoughlin line. Similarly, lengthy HCT extensions to small centers like Damascus and the Durham interchange also failed to have promising ridership. The Forest Grove extension is an attempt to tie a town center to the Hillsboro Regional center with a relatively short HCT extension for land use purposes, while the Powell, Damascus and Durham routes are much longer and would not serve a clear land use function. Recommend no change to Region 2040 text.

Metro Staff Recommendation on Comment 12 only: Agree. Recommend including HCT extension from CTC to Damascus along Sunnyside Road corridor.

14. Comment: Show I-205 HCT from I-84 to CTC as LRT or drop airport and Tigard extensions to HCT category for consistency (Clackamas County).

TPAC Recommendation on Comment 14: Disagree; airport LRT is a radial line that connects the Central City to a singular regional facility, and as such is not comparable to 205 alignment in terms of function, ridership potential and effect on potential density.

15. Comment: Commuter rail along some routes performed well in the growth concepts and should be included in the Recommended Alternative (Tri-Met).

TPAC Recommendation on Comment 15: Disagree; although commuter rail performed well in some cases (McMinnville), most lines performed less effectively within the UGB, where they competed with better transit service. While the concept should not be ruled out in the future as an HCT option, the modest commuter rail ridership in the various growth concepts does not justify it as a major transit service element. Recommend no change to Region 2040 text.

16. Comment: Reflect a light rail station at SW 114th along the Westside MAX route (City of Beaverton).
TPAC Recommendation on Comment 16: Disagree; 114th falls within the Beaverton regional center, and the purpose of the station community designation on the Concept Map is to show land use assumptions. In this case, the development density assumptions of the regional center would exceed that of a station area.

17. Comment: Correct analysis and Concept Maps to show LRT alignment in Oregon City along Center Street to Railroad Avenue (City of Oregon City).

TPAC Recommendation on Comment 17: Agree. Recommend map revisions as proposed.

BICYCLE & PEDESTRIAN

18. Comment: Should include pedestrian/bicycle network in transportation discussions (City of Portland).

TPAC Recommendation on Comment 18: Agree; recommend including language proposed by City of Portland to the RUGGO document:

• add to page 44 following light rail discussion:

   Bicycle and Pedestrian Networks

   Bicycling and walking should play an important part in the regional transportation system, especially within neighborhoods and centers and for other shorter trips. They are also essential to the success of an effective transit system. In addition to the arrangement of land uses and site design, route continuity and the design of rights-of-way are necessary. The Regional Transportation Plan will establish regional objectives for these modes.

• emphasize pedestrian travel in general discussion of centers in first paragraph on page 35 of RUGGO document:

   "...and housing with compact development and transit service in a walkable environment is intended..."

19. Comment: All areas in the region should have bicycle access (Burkholder).

TPAC Recommendation on Comments 19: Agree; as is presently the case, few streets will actually exclude bicycle use. However, high-quality bicycle improvements will not be universal in RTP, and will instead focus on key
linkages based on urban form and major attractions. Recommend no change to Region 2040 language.

20. Comment: Reconcile text in Recommended Alternative analysis with RUGGO language regarding "high-quality pedestrian environment" in corridors and station communities (O'Reilly).

**TPAC Recommendation on Comments 20:** Agree; recommend the following revisions:

- revise first paragraph on page 40 of the RUGGO document as follows:

  "They provide a place for densities that are somewhat higher than today, and feature a high-quality pedestrian environment and that are convenient access to transit."

- revise the second paragraph on page 40 of the RUGGO document as follows:

  "Station communities are nodes of development centered around a light rail or high capacity transit station, and feature a high-quality pedestrian environment."

**FREIGHT & INTERMODAL FACILITIES**

21. Comment: Recommended Alternative growth concept should reflect national/international economic role of the region (Port of Portland; City of Portland).

22. Comment: Freight movement in the region should be emphasized in the concept, reflecting recent work on commodity flows (Port of Portland).

**TPAC Recommendation on Comments 21-22:** Agree; recommend including the following language proposed by the City of Portland that addresses these issues:

- new paragraph on page 41 at the beginning of Employment Areas section:

  The Portland metropolitan area economy is heavily dependent upon wholesale trade and the flow of commodities to national and international markets. The Region 2040 Commodity Flow Analysis concluded that the region's ratio of wholesale to retail trade is 2.7 to 1. (Most other metropolitan areas have a ratio of 1.7 to 1.) The high quality of our freight transportation system, and in particular our intermodal freight facilities, are essential to continued growth in trade. The intermodal facilities (air and
marine terminals, freight rail yards and common carrier truck terminals) are an area of regional concern, and the regional framework plan will identify and protect lands needed to meet their current and projected space requirements.

- new section on page 42 of Transportation Facilities section:

Intermodal Facilities

The region's continued strength as a national and international distribution center is dependent upon adequate intermodal facilities and access to them. Intermodal facilities include Marine terminals, railroad intermodal points, such as the Union Pacific's Albina Yard, the airports and the Union Station/inter-city bus station area. The Regional Transportation Plan will identify these areas and their transportation requirements and will identify programs to provide adequate capacity.

23. Comment: Primary rail facilities should be included on the analysis and Concept Map (Port of Portland).

24. Comment: Key intermodal facilities should be included on the analysis and concept maps (Port of Portland).

**TPAC Recommendation on Comments 23-24:** Agree; analysis and concept maps will be amended to include key intermodal and primary rail facilities.

25. Comment: Continued freight movement on multi-modal routes should be addressed (Port of Portland).

**TPAC Recommendation on Comment 25:** Agree; recommend adding the following paragraph to the end of the "Multi-modal arterials" section on page 43 of the RUGGO document:

Some multi-modal arterials also carry significant volumes of freight. The RTP will ensure that freight mobility on these routes is adequately protected by considering freight needs when identifying multi-modal routes, and in establishing design standards intended to encourage alternative modes of passenger travel.

26. Comment: Add the following new definitions to the Glossary (Port of Portland):

**Freight Mobility.** The efficient movement of goods from point of origin to destination.
Intermodal Facility: A transportation element that accommodates and interconnects different modes of transportation and serves the statewide, interstate and international movement of people and goods.

TPAC Recommendation on Comment 26: Agree. Recommend revisions as proposed.

FUTURE ANALYSIS & POLICY

27. Comment: Need to clarify how the RTP will be acknowledged at the local level now that it is part of the functional plan (City of Milwaukie).

TPAC Recommendation on Comment 27: Disagree; Chapter 8 identifies the RTP as a functional plan, and local plans will continue to conform according to established practice. Recommend no change to RUGGO text.

28. Comment: New links modeled may not be realistic; land use and transportation links may need to be adjusted to reflect most likely transportation links (Washington County).

TPAC Recommendation on Comment 28: Agree; the importance of new collector and arterial connections is central to the performance of all modes in the Recommended Alternative. However, the most appropriate forum for further examining transportation links is in the upcoming RTP process. Among the products that will result from the RTP update will include land use recommendations reflecting both areas that are difficult to serve and areas where the potential level of access could support additional development. Recommend no change to Region 2040 text.


TPAC Recommendation on Comment 29: Agree; however, these will be elements of the updated RTP where performance and systems needs will be studied in much greater detail. Recommend no change to Region 2040 text.

30. Comment: TDM should be included in transportation sections (City of Portland).

TPAC Recommendation on Comment 30: Agree; recommend including the following language proposed by the City of Portland:

• add to page 44 following new "Bicycle and Pedestrian Networks" section:
Demand Management/Pricing

The land uses and facilities in the Growth Concept cannot, by themselves, meet the region's transportation objectives. Demand Management (carpooling, parking management and pricing strategies) and system management will be necessary to achieve the transportation system operation described in the Growth Concept. Additional actions will be needed to resolve the significant remaining areas of congestion and the high VMT/capita which causes it. The Regional Transportation Plan will identify explicit targets for these programs in various areas of the region.

LAND USE

31. Comment: Need to better answer questions about redevelopment inside UGB before establishing urban reserve needs (Washington County).

TPAC Recommendation on Comment 31: No action. This comment has been forwarded to MTAC for consideration.

32. Comment: Green Belt/Green Corridor concept should be retained as originally presented (Washington County).

TPAC Recommendation on Comment 32: No action. The Green Corridor concept was not modified in the Recommended Alternative. The comment on "Green Belts" has been forwarded to MTAC for consideration.

33. Comment: Edge development should not be limited to low density (Washington County).

TPAC Recommendation on Comment 33: Disagree; from a transportation standpoint, edge development is the least likely to build upon existing transportation investments, and the most likely to require disjointed extensions/expansions of urban systems, including transportation. This comment has been forwarded to MTAC for consideration.

34. Comment: Jobs/housing balance assumptions for neighboring cities too simplistic; needs to be further refined (Tri-Met).

TPAC Recommendation on Comment 34: Agree; neighboring city job/housing balance and subsequent travel demand will be refined as part of the RTP update travel forecasting exercise. This comment has been forwarded to MTAC for consideration.
35. Comment: Should recognize impact of neighboring city growth on fringe communities.

**TPAC Recommendation on Comment 35:** No action. This comment raises jurisdictional issues that may be difficult to resolve within the Region 2040 growth concept adoption time frame, and has been forwarded to MTAC for consideration.

**MTAC COMMENTS**

In their review of the Recommended Alternative, MTAC forwarded a number of comments on transportation issues to TPAC for consideration:

1. Comment: Why are employment areas not served with HCT or LRT (James Zehren)?

   **TPAC Recommendation on MTAC Comment 1:** No action. The employment density of these areas is not sufficient to warrant HCT service; instead, these areas are best served by a combination of local bus and employer-based service.

2. Comment: Should insert "Neighbor Cities" in last sentence of the "Regional through-routes" section (James Zehren).

   **TPAC Recommendation on MTAC Comment 2:** Agree; recommend revising last sentence of this section as follows:

   "They shall focus on providing access to centers and neighboring cities, rather than access to the lands that front them."

3. Comment: The text in the "Collectors and local streets" section should be revised to read "...streets per mile plus sidewalks, bike lanes and paths, and other design standards to encourage non-automobile modes of travel within neighborhoods" (James Zehren).

   **TPAC Recommendation on MTAC Comment 3:** Disagree; by definition in most plans, collector and local streets are designed to encourage these modes; the missing piece in most new developments is that the street itself is not adequately connected to the surrounding neighborhood. These issues will be addressed as part of the RTP update. Recommend no change to Region 2040 text.
4. Comment: The "Light rail" section on page 43 of the RUGGO document should be revised to include the language "where feasible, LRT lines could also connect the neighbor cities with the centers and the Central City" (James Zehren).

5. Comment: Show "proposed LRT" or "proposed HCT" links between neighboring cities and main urban area on Concept Map (James Zehren).

**TPAC Recommendation on MTAC Comments 4-5:** Disagree; of the lessons learned from the growth concepts, we found that HCT (and especially LRT) to the neighboring cities was not justified on the various lines that were modeled. Recommend no change to Region 2040 text.
GENERAL

1. Comment: Include a general introduction that outlines the context of the 2040 decision (TPAC discussion).

TPAC Recommendation on Comment 1: Agree; recommend the following language be added as an introductory paragraph in the "Transportation Facilities" section on page 42 of the RUGGO amendments:

In undertaking the Region 2040 process, the region has shown a strong commitment to developing a regional plan that is based on greater land use efficiencies and a truly multi-modal transportation system. The transportation system defined in the growth concept serves is a theoretical construct that attempts to serve the Recommended Alternative urban form. The modeled system reflects only one of many possible configurations that might be used to serve future needs.

As such, the Recommended Alternative network provides only general direction for development of an updated Regional Transportation Plan (RTP), and does not prescribe or limit what the RTP will ultimately include in the regional system. Instead, the RTP will build upon the broader land use and transportation directions that are defined in the Recommended Alternative.


TPAC Recommendation on Comment 2: No action.

Metro Staff Recommendation on Comment 2: Agree; staff recommends adoption of the following revisions to section 4.5.3 of the RUGGO amendments as follows:

"Modify state plans, regulations, and activities and related funding to ensure enhance implementation of coordination with the regional framework plan and functional plans adopted by Metro. and d Direct state programs agencies and
ROADWAYS

3. Comment: Show potential regional through-routes on Concept Map (City of Gresham).

**TPAC Recommendation on Comment 3:** Agree; map should be revised to show conceptual Mt. Hood Parkway, Sunrise Corridor and I-5/99W connector routes.

4. Comment: Need to better acknowledge regional role of collector and local streets (O'Reilly).

5. Comment: Need to reconcile "8-10 per mile" with "10 per mile" references - both occur in text (O'Reilly).

**TPAC Recommendation on Comments 4-5:** Agree; recommend the following revisions:

- add to third paragraph on page 41 of land use text:

"One of the most significant problems in some newer neighborhoods is the lack of through streets connections, a recent phenomenon that has occurred in the last 25 years ... While existing neighborhoods will probably not change, areas of largely vacant land To improve local connectivity throughout the region, all areas shall develop master street plans to including at least that include from 8 to 20 through local streets connections per mile, which would allow for better improve access for all modes of travel and still allow some albeit short cul-de-sacs.

- add to the "Collectors and local streets" section on page 43:

"The RTP should consider a minimum standard of eight to ten twenty through streets per mile, applied to both developed and developing or undeveloped areas to reduce local travel on arterials."

TRANSIT

6. Comment: Regional Centers definition should be changed to reflect HCT, not LRT connections (ODOT).

**TPAC Recommendation on Comment 6:** Disagree; with the exception of Washington Square, all of the Regional Centers are located on existing or planned LRT lines. The distinction of LRT service to regional centers specifically...
reflects the special role that these centers will play in the growth concept, and a commitment to serve these areas with a quality of transit that only light rail can offer.

7. Comment: Dual HCT routes to Washington Square and Oregon City are confusing; one route should be shown (Clackamas County).

8. Comment: HCT system too expansive; duplicate lines should be deleted (ODOT).

**TPAC Recommendation on Comments 7-8:** Disagree; two alternatives are available to both Washington Square and Oregon City and should continue to be shown. However, the following clarifying language is proposed for the "Light Rail" section on pages 43-44 of the RUGGO document:

"...along their routes. The Concept Map shows these existing, planned and potential lines (and where two alternate routes are possible in the cases of Washington Square and Oregon City). The light rail connections shown on the Concept Map assume a commitment by local jurisdictions along proposed LRT routes to plan for supportive land uses prior to extension of the LRT system. The Concept Map is also not a definitive high-capacity transit plan; potential HCT/LRT routes not shown on the map may be considered in future transportation planning efforts."

**FUTURE ANALYSIS & POLICY**

9. Comment: Real access/development controls in Green Corridors should be refined; role of Metro, ODOT and counties in maintaining Green Corridors/Rural Reserves should be better defined (ODOT).

10. Comment: Transportation improvements that serve neighboring cities should not be implemented until intergovernmental agreements are in place (ODOT).

**TPAC Recommendation on Comments 9-10:** Agree; MTAC/MPAC may add new text addressing the potential roles that Metro, ODOT, DLCD, the counties and neighboring communities might play as part of implementing this aspect of the Recommended Alternative. However, these issues could be addressed as part of the RTP update and other elements of the Framework Plan.

11. Comment: Delete item #3 from page 18 of the RUGGO amendments regarding consolidation of air quality activities.

**TPAC Recommendation on Comment 11:** No action.
Metro Staff Recommendation on Comment 11: Disagree; recommend amending item #3 on page 18 of RUGGO document to read:

"The region, working with the state, shall pursue close collaboration the consolidation of the Oregon and Clark County Air Quality Management Areas."

12. Comment: Amend air quality language to include new language on CO2 emissions and greenhouse gases (City of Portland).

TPAC Recommendation on Comment 12: Disagree.

Metro Staff Recommendation on Comment 12: Agree. Recommend adoption of language similar to that proposed by the City of Portland, and as included in the MTAC recommendations.

LAND USE

13. Comment: Gateway district should be included as a regional center (City of Portland).

14. Comment: Total number of regional centers should be decreased (Tri-Met).

TPAC Recommendation on Comments 13-14: Gateway is already served by many of the transportation facilities that are intended to serve regional centers, and therefore could be appropriate as a major center in terms of accessibility. However, TPAC is concerned about the total number of new centers in terms of the market available to develop such areas, and the limited transportation funds with which to serve developing regional centers. The following text revision is proposed for the last paragraph of the "Regional Centers" discussion on page 39 of the RUGGO document:

"...are attractive places to conduct business. The relatively small number of centers reflects not only the limited market for new development at this density, but also the limited transportation funding for the high-quality transit and roadway improvements envisioned in these areas."
To: Metro Executive, Metro Council, MPAC, JPACT

From: Sensible Transportation Options for People

Date: November 3, 1994

Sensible Transportation Options for People (STOP) supports the proposed Recommended Alternative in concept. We also support approval of the RUGGO amendments and concept map as planned on December 8, 1994.

We have a number of suggestions and refinements:

1. Transportation System

WESTERN BYPASS: We are delighted that Metro's modeling demonstrates, once again, that the Western Bypass does nothing to relieve traffic congestion in Washington County, and that 2/3 of the proposed project has been dropped.

However, the "southern portion" of the Western Bypass (from I-5 to 99W) is included -- as a freight connection and as a primary route to Newberg, a "neighboring city." We are concerned that premature planning and construction to accommodate commuting traffic from Newberg will result in inappropriate growth dependent on automobile access to Metro area jobs and potentially be detrimental to a desirable jobs/housing balance in McMinnville.

Freight is important. Too often roadways for freight are taken over by SOV automobiles. Before capacity is added for freight, we need to assure that we are not just building SOV lanes. This proposal should be marked, "subject to detailed analysis" and substantiated with a thorough, multimodal transportation analysis -- with emphasis on demand reduction -- before it becomes a given.

Although STOP does not have official positions on either the Mt. Hood Parkway or the Sunrise Corridor, we are concerned that these proposed facilities will induce auto dependent sprawl at the edges (inside and out) of the UGB unless access is carefully controlled and high quality alternative mode options provided. We question the justification that the Mt. Hood Parkway "better connects Sandy to the urban area" when Highway 26 links Sandy to the Regional Center of Gresham. The existing connection is
adequate. It is a four lane, limited access highway between Sandy and our UGB.

MODE SPLIT: Central to having a high quality of life in the year 2040 in the Metro region is the fully developed option to walk, bicycle or use transit in order to conveniently, safely and enjoyably reach desired destinations. Some of that is accomplished by your proposed mixed use development. Two additional steps, at minimum, are required:

a. Set achievable but challenging mode split targets, and build the infrastructure to accomplish them. STOP strongly supports a mode split of 15% pedestrian, 15% bicycle, 20% transit and 50% automobile in 2040.

b. The only geographic areas that performed well in year 2040 are those with street connectivity of 20 streets/mile. Your proposed JPACT RUGGO amendment and Preferred Alternative recommendation should call for a minimum of ten connections in areas already developed. Pedestrian and bicycle connections should be a priority if full street connectivity is not feasible. In newly developing areas, it should require that master street plans include at least eighteen to twenty local street connections per mile, which would improve access for all modes of travel. We know that twenty connections per mile work, fewer appear to function significantly less well. The region has no excuse for endorsing new development that cannot be well served by the accompanying transportation infrastructure.

Metro's model was developed to project automobile traffic. It does poorly with bicycle and pedestrian trips and they are grossly underrepresented today. The model is also insensitive to the effects on total trip reduction and mode split accomplished by pre-1950 style neighborhoods. We must not let today's artificially low figures for pedestrians and bicyclists dominate the discussion of goals for 50 years hence.

The Recommended Alternative falls far short of reflecting transit ridership equal to even that in Tri-Met's Strategic Plan (approximately 10 – 15% in year 2005). Tri-Met's own plans should provide a minimum mode split for transit projections in 2040!

Procedurally, Metro transportation modeling needs to set a priority of accurately reflecting bicycle ridership and pedestrian trips. Those transit trips originating on foot or by bicycle (as opposed to automobile park and ride) need to be called out also.

2. Land Use and the Urban Growth Boundary

Hold the Urban Growth Boundary; do not expand it! Holding the UGB restates the region's commitment to preserve irreplaceable resource lands and to strengthen existing communities.
Growth can happen without sprawl. The public has asked for it, Metro needs to deliver it. In order to hold the UGB for the planning period, average lot size needs only to decrease 8% (for both "outer" and "inner" neighborhoods) from the size that would gobble up 14,500 acres. We urge adoption of densities which do not require expanding the UGB, and statements that require development to build to planned densities, as holds in the City of Portland today.

The recent Vancouver WA, experience of neighbors increasing planned density by participating in the design of an infill development is a model for citizen participation in neighborhood design.

STOP supports "skinny streets" in residential areas to further reduce the impact of road infrastructure on lot size and to assist in holding the UGB.

If the UGB is to expand at any point, there must be clear criteria governing that decision. Such a move should not reward developers or local jurisdictions building below planned densities.

RUGGO Amendment: Page 34, paragraph 5 calls for an additional 14,500 acres to be added to the urban land supply. DELETE THIS SECTION.

If the final growth concept adopted by the Metro Council includes any increase in the UGB, no land designated EFU or Forest Lands should be included. These are our most important rural resources and require our highest protection.

RURAL RESERVES are an important component of good growth management and should be clearly identified and protected.

We support the concept of "rural reserves" and urge retaining a substantial rural reserve ring around the entire urban area to separate rural from urban uses. We urge Metro to work closely with state and local governments to implement and maintain the rural reserves.

STOP supports the rural reserves as shown on the Region 2040 Growth Concept Map. They will reassure citizens fearing we will sprawl, incrementally, through irreplaceable farm and forest lands.

"INNER" and "OUTER" neighborhoods need additional thought.

Rather than setting a larger lot size for all "outer" neighborhoods, larger lot size should be reserved for neighborhoods difficult to serve by regularly scheduled transit, wherever they fall. These lots should average 6,907 feet, and multi-family housing should be minimized in these locations. Reserve highest densities for areas nearest the best transit service.
Neighborhoods located where they can be transit supported should have lot size averages of 5,259 sf. Some of these are occurring today in the suburbs; Bethany, Fairview Village and East Sunny-side Village are examples.

We add our voice to the demand for HOUSING AFFORDABILITY. However, affordable housing is based on more than the original price paid for a lot and/or house. Affordability is dependent on infrastructure costs as well: water, sewer, transit, roads, emergency services, police and schools. Affordable housing is possible only through affordable communities. We urge you to develop cost analyses for compact communities vs. suburban style ones.

We also remind the Council that the Portland Region, with a UGB in place for the last twenty years, has had more affordable housing in that period than any sprawling major city on the west coast.

REGIONAL CENTERS

There are too many Regional Centers. We encourage you to reduce the total to five. They should exclude either Washington Square or Beaverton. If each one is supposed to serve "hundreds of thousands of people," we are beyond saturation.

Areas such as Clackamas Town Center, Washington Square, and Gateway, which are under largely single ownership and are dependent on the automobile, should only be considered for Regional Center status if the major owners sign a contract with Metro agreeing to develop/redevelop in the transit supportive spirit of the 2040 concept. Otherwise, we can invest major public infrastructure with no return. No private organization would invest without a contract. Neither should the taxpayers. Local governments should be required to sign a similar contract with Metro before light rail is made available to proposed Regional and Town Centers such as Oregon City and Milwaukie.

3. Open Space

Metro's research shows that the "public's highest value is to protect the natural beauty of our region," yet the plan for "open spaces" is distressingly vague. We urge you to include commitment for the addition, acquisition and preservation of natural areas, Greenspaces, parks, linear parks, trails and wetlands.

Open spaces in the Recommended Alternative "represent 34,000 acres of the 248,500 ares in the expanded UGB" -- about 14% of the urban land. However, 6,500 of those 34,000 acres are privately owned and already developed at low density. They do not benefit the community nor is their use publicly owned. "Water and roads" consume yet more.
Proposed RUGGO Amendment: It is a goal to have a park or publicly owned natural area within one half mile of every home in the region.

Amendment to the Recommended Alternative: Add protection of streams, wetlands, linear corridors and trails. Include parks/natural areas as components of each community, within one half mile of every home in the region.

In summary, STOP feels these recommendations will improve your Recommended Alternative and its corresponding RUGGO amendments. They can be debated and incorporated in the remaining time. We look forward to approval of the RUGGO amendments and concept map on schedule, December 8, 1994.

Metro has committed to the citizens of the region that it will adopt the RUGGO amendments and concept map on schedule. Tens of thousands of citizens have participated in the steps building toward adoption. It is imperative that the Council keep its compact with the community by completing the process on schedule. We have deadlines, imposed from outside the region, on functional plans that rely on 2040 adoption for guidance. It is time to move forward to implementation.

Congratulations to you and your staff on a comprehensive, well executed plan for our regional future.


Molly O'Beirne
President
MEMORANDUM

DATE: November 2, 1994

TO: Metro Council

FROM: Tom Walsh

SUBJECT: Region 2040 Recommended Alternative

At its October meeting the Tri-Met Board passed a resolution endorsing the importance of moving ahead now with the policy direction articulated in the Region 2040 Recommended Alternative (attached). Tri-Met applauds the hard work of Metro staff in advancing 2040 to where it is.

Tri-Met is committed to working closely with Metro to move 2040 to implementation. The success of our Strategic Plan and 2040 are closely linked. Achieving the increased ridership and mobility envisioned in the Strategic Plan requires a shift in regional land use patterns and transportation priorities as defined in 2040. The Board noted that relationship and committed themselves to work with our regional partners to seek the funding necessary to move toward the level of transit expansion to support the urban form in the Recommended Alternative.

As the Recommended Alternative moves to adoption there are four additional points Tri-Met staff asks you to consider. While the Board has not specifically acted on them we believe they are consistent with the flavor of the Board’s resolution.

Attachments:
- Board Resolution
- Tri-Met Staff Comments

CC: Tri-Met Board of Directors
- JPACT
- MPACT
- Andy Cotugno
- John Fregonese
WHEREAS, the Tri-Met Board of Directors (Board) adopted a mission and goals in March 1993 which set an aggressive future direction for the agency; and

WHEREAS, achieving the increased ridership and mobility envisioned in the Tri-Met Strategic Plan requires a shift in regional land use patterns and transportation investment priorities; and

WHEREAS, implementation of Tri-Met's mission and goals can only be accomplished as a regional partnership; and

WHEREAS, in adopting the mission and goals, the Tri-Met Board formally recognized that:

A. The Metro Region 2040 process is the appropriate forum to develop a long-term regional vision for transportation and land use, and

B. Tri-Met will modify the District's mission and goals to be consistent with the adopted Metro Region 2040 Plan and updated region transportation plan; and

WHEREAS, major policy initiatives underway at Tri-Met have been integrated into the Region 2040 Recommended Alternative including Fastlink Corridors, the Primary Transit Network, Station Community Planning, and the acceleration of a regional light rail system; and

WHEREAS, Tri-Met has been a full-fledged partner throughout the Region 2040 process in a policy, technical, and financial capacity.

NOW, THEREFORE, BE IT RESOLVED:

1. The Tri-Met Board acknowledges the strong policy linkage between the Region 2040 Recommended Alternative and the Tri-Met Strategic Plan.

2. The Tri-Met Board endorses the importance of moving ahead now with the policy direction articulated in the Recommended Alternative:

   A compact urban form inside the recommended Urban Growth Boundary;
- Focusing a major portion of new growth into centers and corridors well served by transit;
- Increasing the reliance on transit, walking, and biking as a means to increase regional mobility;
- Preserving a series of greenspaces both within and beyond the boundary.

3. The Tri-Met Board recognizes that a true regional partnership will be necessary to move Region 2040 to implementation.

4. The Tri-Met Board will work with our regional partners to seek the funding necessary to move toward the level of transit expansion to support the urban form in the Recommended Alternative.

Dated: October 26, 1994

[Signature]
Presiding Officer

Attest:

[Signature]
Recording Secretary

Approved as to Legal Sufficiency:
Tri-Met Staff Comments on Region 2040

SET HIGHER TARGETS FOR TRANSIT

1. The role of transit in the Region 2040 Transportation Network requires more assessment at both a technical and a policy level. The results of the 2040 model runs are very encouraging. The recommended alternative had the highest levels of transit ridership with the smallest increase in transit service.

We are not convinced that the results of the modeling for the recommended alternative properly set the target for the role of transit in the region. The Metro model forecasts 6.31% of all trips would be on transit versus 2.78% today. In the Tri-Met Strategic Plan, to help assure mobility, we envisioned a future where at least 10% of all trips were on transit. By comparison, the characteristics of Vancouver, British Columbia today are similar to where we might expect the Portland region to head under the Recommended Alternative. Vancouver currently has 1/3 more people than Portland, 1/3 higher density, and three times the transit ridership. In Vancouver 10% of all trips are on transit. Tri-Met will adjust its plans upwards or downwards to be consistent with regional objectives. To assure mobility, we continue to believe 10% of all trips on transit is an appropriate, if not somewhat conservative, target to plan for.

UNIVERSAL TRANSIT ACCESS AND TRAVEL CHOICES

2. A centerpiece of the Recommended Alternative is the close integration of land use and transportation. Nearly half (43%) of households would be located in centers or corridors served with high quality bus and light rail service. All in all, 63% of households in 2040 would be within a 5-minute walk of transit compared to 65% today.
The region ought to be aiming for an increase in households with access to transit rather than planning for a decline. As a matter of policy 100% of households inside the Urban Growth Boundary ought to have access to transit service within a five minute walk. The RUGGO should be amended to include that objective.

Universal Transit access does not mean everyone will have a big bus or light rail within an easy walk; that’s not practical or cost-effective. The travel market is changing and so must the mix of transit service. Areas not suitable for big bus and rail service can be served with flexible neighborhood service using small vehicles. The focus of Tri-Met’s most frequent service will be defined by the Primary Transit Network (PTN) now being developed as part of the RTP. The PTN will define those areas where the highest intensity of land use and transit service correspond. At the end of the day the mobility standard for the RTP comes down to a single word: choice. Well planned growth offers choices for getting around -- be it by foot, bike, transit or car -- wherever you live inside the Urban Growth Boundary.

**FINE TUNE LIGHT RAIL SYSTEM**

3. Tri-Met supports aggressive expansion of the regional light rail system as envisioned in the Recommended Alternative. Light rail has been demonstrated to be an effective tool to move people, to shape land use, and as a means to defer highway investments.

Given the cost of building new light rail lines, it’s critical that the region demonstrates a prudent approach in defining the future rail system. Tri-Met believes that some of the proposed light rail and high capacity transit lines in the Recommended
Alternative require a rigorous analysis before they are included in the Regional Transportation Plan (RTP). The work program for the RTP needs to allow testing what rail lines should be added to or deleted from the system. The Forest Grove extension, for example, is included in the Recommended Alternative even though it had the lowest ridership of any light rail line tested. Other lines of the same length with ten times the ridership of Forest Grove, like a SE Portland line, were not included in the Recommended Alternative. An I-205 line from the Town Center to Gateway is included even though our technical work shows there is not sufficient capacity to connect it with the existing MAX line. In another instance alternative alignments to serve Washington Square and Oregon City are included on the Recommended Alternative map. The RUGGO language which accompanied the map needs to clarify that 217/Barbur and McLoughlin/I-205 are alternate alignments.

TOO MANY REGIONAL CENTERS

Centers and corridors are perhaps the most important transportation and land use strategy in Region 2040. On paper, the transportation results of the strategy in the Recommended Alternative are superlative. Compared to growing out (Concept A) the Recommended Alternative has:

- 53% more transit riders with 3% fewer service hours; and,
- 33% fewer congested road miles on a road network which has 5% fewer lane miles.

Making all this happen is another matter. There is a limited market for the higher density development necessary to make Regional Centers work. According to Metro’s analysis, to achieve Regional Centers on average new growth would need to occur at
120+ people per acre. That's the equivalent of a mix of 2-3 story and 4-5 story office and residential buildings.

Metro has identified market areas for 4 regional centers. The Recommended Alternative, however, includes 6 Regional Centers. Proposals are now being considered to designate up to 8 Regional Centers. That would be a mistake.

Tri-Met is concerned that by planning for 6 to 8 Regional Centers—when there is only enough market to support 4 collectively—we may actually end up with none. Our advice is to cut the number of Regional Centers down to 4 — Hillsboro, Beaverton, Milwaukie and Gresham. Density is a scarce resource that ought to be used strategically. From experience we know the region has enough market presence to create sprawl. The question remains whether what high density the marketplace will bear can be channeled to create the intense vital centers we all want.

For transportation the risk is at least two-fold. First, regional centers are expected to be the highest priorities for transportation investments. It's easier and more effective to target limited dollars with a rifle approach than a shotgun. Second, the performance of the Recommended Alternative Transportation Systems depends on regional centers to work. If the strategy falters because growth ends up being dispersed and not focused the mobility of the entire region is at risk.
Region 2040
Proposed Amendment Package for JPACT Consideration

Amendments should be received by Metro by November 3, 1994. Mail to: Region 2040, Metro, 600 NE Grand Avenue, Portland, OR 97232-2736 or fax to: 797-1794.

1. Proponent Name: Washington County, Board of County Commissioners

2. Proponent Address: 155 N. First Avenue, Hillsboro, OR 97124

3. Proponent Phone: 640-3519 (c/o Brent Curtis, Planning Division)

4. Proponent Fax (if available): 693-4412 (c/o Brent Curtis, Planning Division)

5. (optional) 5a. If this amendment is proposed by a local government or a group, please give their full name and address:

   Washington County, Board of County Commissioners, 155 N. First Avenue, Hillsboro, OR 97124

5b. (not optional if 5a. is completed) If a local government or group is sponsoring this amendment, please attach meeting minutes, resolution or form in which action supporting the proposed amendment was taken.

6. Your proposed amendment would change (check one): Text/Policy only_______ Map only _________ Both ______X______

7. Text/Policy Changes. If you are proposing a change to language in the Recommended Alternative or the RUGGO's, please indicate your proposed text changes. (A photocopy of the text in question with changes legibly noted is fine.)

   Please see attached submittal.

8. Map Changes. 8 a. If you are proposing a change to the Concept Map, please generally describe the geographic area, the present designation and your preferred designation.

   (Example: In the vicinity of 1st Street and Main Avenue, city of Maple Hill, change the designation from industrial area to employment area).

   Please see attached submittal.

(jbc-mpac.e)
November 2, 1994

Dear JPACT Members:

The purpose of this letter is to share with JPACT members the perspective of Port of Portland staff on the Metro 2040 planning process, in which the Port has been a participant.

The Executive Officer's Recommendation for the Growth Concept (Concept) is the product of an effort to create a consensus planning concept for the long-term future of the Portland metropolitan area. Although the Concept is primarily a land use document, it includes or implies significant transportation decisions that also merit attention. I believe it represents a good overall basis for the hard work yet to come of developing and implementing more specific plans and programs needed to keep our region as livable and prosperous as it is today.

A few paragraphs of background on Port concerns may be useful in setting a context for our comments.

Background

Portland has developed over the past century and a half largely due to its strategic location. It is positioned at the confluence of two major rivers that have linked Portland both to the Pacific Ocean, its historical trade route to the world, and to resource rich inland areas that have provided products for the world market. Decisions made throughout Portland's history have reinforced that locational advantage—the country's second largest barge system, three transcontinental railroads, an interstate freeway system, and an international airport. This past investment is the basis for our region's competitive edge in trade and distribution industries, an important component of our economy, as the 2040 Commodity Flow Analysis indicates.

This region now sits at the edge of the most economically dynamic area of the world. Nine of the world's ten fastest growing countries are on the Pacific Rim. Fifty-four percent of all U.S. trade is with Asia. Last year, the Asian economies grew by an average of 5 1/2 percent. Overall world economic growth was less than half that figure. This giant new market will create some of the biggest business and financial opportunities in history.
A significant portion of that Pacific Rim trade moves through this region now as a result of our efficient, interconnected transportation network. Maintaining and enhancing that network and its intermodal connections is critical to the region's economic vitality. The Commodity Flow Analysis indicates that overall freight volume in this region will almost triple by 2040 (from 66 million tons to 175 million tons), if we can maintain the efficiency of our freight transportation network. This growth in freight tonnage, which is much faster than population growth projections, suggests that transshipment, exporting, warehousing, and distribution afford this region an opportunity to generate new economic activity at a rate that considerably exceeds the rate of growth in population and many of its attendant liveability problems.

Freight movement in this region is supported by both public and private infrastructure that work in combination. Our strength lies in maintaining access to all modes to ensure competitive rates to the region's businesses. Maintaining current access levels to industry and intermodal facilities, and current service levels on the transportation network, will require significant investments, both public and private. Opportunities must be sought to maximize investments in both the public and private sector through cooperation and creative solutions. This will require a commitment on the part of all agencies, jurisdictions, and businesses with a stake in the regional distribution and trade network, to work together to keep our competitive advantage through intelligent investments in the overall transportation network.

General Comments

1. The Regional Urban Growth Goals and Objectives (RUGGOs) should be modified to recognize the importance of trade and distribution industries to the regional economy. The future regional land use scenario and resulting transportation system configuration should support the efficient movement of freight. The importance of maintaining good, multimodal access to intermodal facilities, for both freight and passenger movement to national and international destinations, needs to be articulated in the 2040 document.

2. The Growth Concept sets aside significant amounts of strategically located industrial land. Key intermodal facilities and the major rail lines also should be identified on the Concept map, with accompanying text that identifies the need to protect these facilities and the access routes to them.

3. In addition to completing the LRT system for moving people, an explicit regional priority should also be established for improving the transportation network to ensure adequate freight mobility in all three metropolitan counties and on major routes into and out of the region. All
of these transportation investments should be made so that they reinforce the compact urban form of the region, providing good access both to concentrations of people and to intermodal facilities.

The Port is proposing additional RUGGO amendment language which reflects these comments (enclosure).

Specific Comments

4. The recommended Growth Concept proposes a relatively small amount of land for urban expansion over the 50-year time frame. This seems appropriate. The less land-extensive urban development is (and the more efficiently land is used), the more efficiently it can be served by infrastructure. This, in turn, means using less of the region's limited funding resources to accommodate a given amount of growth.

5. One of the primary implications of this tight urban growth boundary is that the region will need to manage the transportation network (road, rail, etc.) in a much more intensive way. An interconnected traffic management program which ensures, for example, that "major through routes" and "multi-modal corridors" have adequate capacity to handle the region's freight movement needs is critical. This means that current levels of delay on the freight movement system should not be allowed to deteriorate and should be improved in some freight-intensive corridors.

6. Additional elements of the roadway system may also be needed over the next 50 years (e.g. better east-west connections in the Columbia Corridor, possibly a new bridge over the Columbia and/or the Willamette, and improved arterial connections in central Washington County) in order to handle the projected growth within the greater metropolitan area. This is not a recycled argument for the third bridge, it is simply a reminder that the predicted level of growth is so significant that some new road capacity may have to be added despite all the alternative measures we institute.

7. Road system improvements should be targeted at specific freight "bottlenecks" and not necessarily used to enhance the overall capacity of the system. For instance, road/rail conflict points should be minimized. Not only will eliminating these constriction points lead to better freight mobility, but it should also lead to better regional air quality. This, in turn, will mean more economic development capability under the regional thresholds for air pollutants. These improvements will also create more capacity on the rail system for handling freight. The IMS and the freight element of the Regional Transportation Plan will identify specific parts of the road and rail systems that need to be improved.
8. The Concept assumes that significant growth will occur in "neighboring cities." This needs to be accomplished, as Metro staff has proposed, in cooperation with those other jurisdictions in a manner that leads to an appropriate level of growth for those communities. If growth in areas outside Metro's control is planned for and dealt with in a positive fashion (e.g. using "rural reserves," appropriate transportation linkages, etc.), the greater urban area (northern Willamette Valley and Clark County) can grow and still maintain its livability.

9. A jobs/housing balance should be a goal for each regional subarea (i.e., not only for neighboring cities, but also for geographical subareas within the existing Urban Growth Boundary (UGB)). Though one cannot expect to achieve a situation where people always work and live in the same area, having a good mix of housing and jobs will mean a more equitable distribution of housing and economic opportunity for everyone in the metropolitan area. It should also mean, eventually, that people will need to take fewer long trips by car, again reducing the pressure to spend money on increasing street system capacity for automobile use.

10. Mixing residential, commercial, public, and some types of industrial uses together into more complete communities is necessary and desirable in order to reduce reliance on the automobile and generally enhance the quality of community life. The recommended concept makes appropriate use of this idea.

11. Certain land uses need to continue to be separated from residential and other more sensitive uses, as the Concept recognizes. Virtually all heavy industrial development, including marine terminals and certain other unique facilities such as airports, are examples of activities that need to remain separated from other urban uses. Freight intermodal facilities also need to be protected in this same way. Allocating sufficient land within the UGB to allow these important intermodal facilities to expand to keep pace with growing need over the next 50 years is a key aspect of the Concept's proposed "industrial areas." Moreover, while it has been stated that there is an over-supply of industrial land in the region, it is important to distinguish, as Metro staff has, between land needed for heavy industrial development, which is limited, and land for other types of industrial uses (e.g. light industrial, and flex space uses), which is relatively plentiful and which can also be used for "employment" and other mixed uses.

12. A corollary point is that many of these industrial uses also have distinct locational requirements which, for the most part, have been taken into consideration in the recommended Concept. For instance, marine
industrial uses can only occur adjacent to the river and also need good access from both road and rail. The 2040 Commodity Flow Analysis makes it clear that the location of other intermodal facilities is also critical. Major intermodal connections between truck and rail are made within rail yards in central Portland locations. These will become increasingly important in the future. Ensuring that these facilities are protected, allowed to operate efficiently, and provided good access to the regional road and rail systems is critical to the long-term health of our economy.

13. The Brooklyn Yard area in southeast Portland is indicated on the map as a "mixed-use employment center". About half of the light blue area is warehouse and light manufacturing uses, and the eastern portion covers the rail intermodal yard. The Port sees this yard as a key intermodal facility and believes that it should be designated as such, both on the Growth Concept and through the Regional Framework Plan process. We recognize that the south/north light rail line will probably run along McLoughlin Boulevard in this vicinity. Both light rail station area redevelopment in the vicinity of McLoughlin/17th Avenue and preservation of the intermodal yard, over 1/4 mile away, should be feasible.

14. The mixed use designation between 82nd and 122nd in the Columbia South Shore reflects the reality of the development that is happening, and will continue to occur, in this area. Our only concern here is that the mixed use category carries with it an assumption that a certain amount of this area will develop/redevelop in residential uses. In this location, close to the airport and the accompanying noise overlay zone, it may be very difficult to find property suitable for residential development to fulfill Metro's housing allocation to this area. Metro and the City of Portland (City) will need to work out a mechanism to transfer most or all of this housing allocation to other areas of the City able to absorb more housing than Metro has assumed.

15. Most of the area immediately north of the existing UGB line adjacent to Portland-Hillsboro Airport has been left out of the proposed "urban reserve study area". Washington County has asked that this area be studied for possible urban expansion. Although the Port does not necessarily oppose studying the area, we continue to believe that a significant portion of it should not be included within the UGB in order to avoid conflicts between future increases in aviation activity at the airport and any residential uses which would most likely be a major component of development in this area, if it is ever brought inside the UGB.

16. It is our understanding that the Recommended Growth Concept map is not meant to be property specific. In the case of west Hayden Island, for
instance, we have been working with Metro staff on the best way to portray future development, and the current best guess is reflected on the Concept map. It should be understood, however, that there is an extensive planning process now under way that will eventually come up with the configuration of the marine terminal area and the area to be left in open space. This configuration may vary significantly from that portrayed on the Concept map. This may also be the case in other parts of the region where there is extensive land yet to be developed.

I hope that JPACT, MPAC, Metro staff, and the Metro Council find these comments useful in deciding on the final 2040 Growth Concept.

Yours very truly,

[signature]

Mike Thorne
Executive Director

Enclosure

cc: MPAC Members
    Metro Councilors
    Rena Cusma
    Andy Cotugno
    John Fregonese
Amendments to II.4 Growth Concept

Pages 34 & 35 - Add a new paragraph to this section (after the first paragraph on Page 35):

The Growth Concept recognizes the significant degree to which the regional economy is based on trade and distribution industries. The 2040 Commodity Flow Analysis concluded that the region’s ratio of wholesale to retail trade is 2.7 to 1, while the national average is 1.7 to 1. The Concept map reinforces this important element of our economic base by setting aside substantial amounts of strategically located land for distribution and other heavy industrial uses, and by designating key intermodal facilities served by good access to regional highway and rail corridors.

Page 41 - Add a new paragraph at the beginning of "Employment areas":

The Portland area’s economy is heavily dependent upon wholesale trade and the flow of commodities to national and international markets. The high quality of our freight transportation system, and in particular our intermodal freight facilities, are essential to continued growth in these distribution industries. Key intermodal facilities (air and marine terminals, freight intermodal rail yards, etc.), identified conceptually on the Growth Concept map, are a subject of regional concern. The Regional Framework Plan will identify and protect lands needed to meet the current and projected space requirements of these key facilities.

Page 42 - Add a new section to Transportation Facilities:

Intermodal Facilities

The region’s continued strength as a national and international distribution center is dependent upon adequate intermodal facilities, and access to them. Intermodal facilities include marine terminals, railroad intermodal yards like the Union Pacific’s Albina Yard, the airports and the Union Station/intercity bus terminal. The Regional Transportation Plan (RTP) will identify these facilities, and their transportation requirements, and will
identify programs to provide good access to them from a regional transportation network that has the capacity to enable them to work efficiently.

Page 43 - Add a new paragraph to the Multi-modal arterials section:

Some multi-modal arterials also carry significant volumes of truck traffic. The RTP will ensure that freight mobility on these routes is adequately protected by carefully considering the impact on trucks when determining which routes should be designated for "multi-modal" status, and in establishing the design standards which will encourage other modes of travel for people.

Pages 45 & 46 - Add the following new definitions to the Glossary:

Freight Mobility. The efficient movement of goods from point of origin to destination.

Intermodal Facility. A transportation element that accommodates and interconnects different modes of transportation and serves the statewide, interstate, and international movement of people and goods.
October 26, 1994

To: Andy Cotugno and TPAC Members

From: Karen Frost Mceey, Executive Director
Bicycle Transportation Alliance

Re: 2040 Comments

Metro staff and citizens have expended tremendous energy and expertise in developing and revising the Region 2040 plan. I congratulate you one and all for envisioning a better alternative to sprawl, congestion and pollution.

The Bicycle Transportation Alliance also has a vision of the future that is, in fact, more optimistic than Metro's. We believe that bicycles and walking are part of the solution for a more livable region. We believe that there are many more who will forsake the single-occupancy vehicle for the good of their health, their neighborhoods and the region—more than 6% Metro's modelling shows will choose bicycle and walking trips in 50 years.

The BTA would like to offer the Region 2040 Plan a goal for increasing bicycle and pedestrian trips that is more realistic and more visionary:

15% of trips will be made by bike and 15% of trips will be made by walking by the year 2040. 20% of trips will be made by transit.

We know that good pedestrian and bicycle facilities support increased transit use.

According to the City of Portland, ridership on the Hawthorne Bridge has increased 674% in 18 years in spite of hazardous circumstances!! Certainly we can project a more promising figure than 6% bicycle modal share in 50 years. Aren't we making decisions on land use, transportation, and quality of life that are supposed to encourage bicycle use and isn't bicycle use necessary to reach our livability goals?

The federal government in "The National Bicycling and Walking Study" has set a goal of doubling the combined percentage of walking and bicycling trips from 7.9% to 15.8%. Portland already exceeds the national average of bicycle trips. And we can do better.

Bicycling and walking support RUGGO Transportation Objective 14.

Biking and Walking:

14.iii. encourage energy efficiency
14.iv. recognize financial constraints
14.v. minimize the environmental impacts....
14.2.1. reduce the region's transportation-related energy consumption.

14.2.2. maintain the region's air quality

14.2.3. reduce negative impacts on parks, public open space, wetland, and negative effects on communities and neighborhoods arising from noise, visual impacts, and physical segmentation.

We have the policy statements. Now we need a definable goal such as 30% combined bike and ped mode share as a tool to motivate and measure our success.

Success has many definitions. Bikes are good for the environment, and they are good for business. In describing the pro-bicycle policies in Groningen, The Netherlands, where 50% of all trips are made by bicycle, Gerrit van Werven, head of economic development for the city, says:

"This is not an environmental program, it's an economic program. We are boosting jobs and business. It has been proved that planning for bicycles is cheaper than planning for cars."

An unimpressive and inaccurate goal has consequences other being evidence of a lack of visioning. The 6% figure will mislead citizens into thinking that an investment in bicycle and pedestrian facilities is futile. If the Metro projection of the increase bike and ped usage from 5% to 6% is askew because it was projected with too little data, please state this in an accompanying paragraph.

People want bike facilities as evidenced by the responses to the Metro 2040 survey. The single greatest category of additional comments were requests for more bike facilities in the region. These people want to get out of their cars. Count them among the 15% in 2040. In addition, a recent survey by the City of Portland Office of Transportation, lack of bike facilities was the number one source of dissatisfaction reported.

Thank you for this opportunity to comment on the Plan and help shape the year 2040.
TO: John Fregonese and M-TAC
FROM: Jim Sitzman, For Six State Agencies
SUBJECT: State of Oregon Comments on the Recommended Metro 2040 Concept

This memorandum follows the July 26, 1994 statement to Metro on the 2040 project prepared by six State of Oregon agencies. In it we focus on how the Recommended 2040 Concept responds to our earlier memorandum and make additional recommendations. Please include this in the material to be reviewed by M-TAC. Material in **bold** is recommended for amendment of the Concept, the map and the work plan.

**BACKGROUND OBSERVATIONS FROM THE INPUT AND OUTPUT DATA**

First, the September 15 Technical Appendix summarizes certain regional control totals in Table 1. By extrapolating from this Table, we note the following:

2040 estimates that new households in the Oregon urban areas will reach 389,563 households. Vacant land in existing land use plans can accommodate 168,120 households, leaving a shortfall of 221,443 households. The Recommended 2040 Concept allocates 30,000 or 13.5% of the shortfall to Neighbor Cities; 58,158 or 26% to Urban Reserves; and the remainder or 60.5% to centers, corridors, neighborhoods, etc. within the current urban growth boundary (UGB).

Second, Metro staff analyses not included in the Appendix shows the following. No expansion of the existing UGB would be necessary, if average new lot sizes were 6907 sq. ft. in Outer Neighborhoods and 5259 sq. ft. in Inner Neighborhoods; if the percent of new, small single family lots were 27% (compared to 20% in the recommended alternative); and if the new single family to multiple family housing split were 60% to 40%.

Third, Table 5 of the Appendix shows that the Recommended Concept assumes less dense new growth on vacant and redeveloped land in Neighborhoods 1 and 2 in the Urban Reserves than the new growth density assumed in Neighborhoods inside the existing UGB.
Fourth, descriptions in the RUGGOs present household and employee allocations for regional centers and town centers. Regional centers receive 3% or 11,687 new households and 11% or 42,688 new employees. Assuming five regional centers, each center averages 2,337 new households and 8,538 new employees. Town centers receive 3% or 11,687 new households and 07% or 27,165 new employees. Assuming 27 town centers, each center averages 433 new households and 1,006 new employees.

By combining the numbers above, we conclude that the existing UGB has additional capacity for growth before efficient use of the land has been maximized. Furthermore, we believe the regional and town centers would require more extensive growth to create the "attractor-service" function described for these centers.

RECOMMENDATIONS FOR RUGGOs AMENDMENTS

I More households can be located within the existing UGB, based on the information provided above. The RUGGOs should target refinement of the 2040 Concept as follows: Reduce Urban Reserve households from 58,158 to 29,079. Include in the Urban Reserve only those resource (agriculture and forest) lands allowed by Urban Reserve Rule OAR 660-21-020 (3)(a). The following measures should be utilized to reach or help reach this target.

A) Reduce average lot size in outer neighborhoods, i.e., from 7566 to 7000 sq. ft.

B) Decrease the overall SF/MF split, i.e., from 65/35 to as much as 60/40.

C) Increase the percent of small lot SFRs, i.e., from 20% to as much as 25%.

D) Increase Urban Reserve Neighborhood 1 & 2 persons per acre average to approximate the new-development densities inside the existing UGB, i.e., from 17.55 and 13.28 to as much as 20 and 16 respectively.

This recommendation is consistent with our request in the July 26 memorandum for Smaller Residential Lot Sizes.

II Too little growth is assigned to regional and town centers. We are concerned that the small-scale assignments of household and employees to these centers will not create the kind of dynamic attractors and service locations envisioned. Centers are earmarked for good highway and transit service, business concentrations for shopping, employment and services,
and redevelopment opportunities. Regional centers are focal to populations of hundreds of thousands, and town centers to populations of tens of thousands.

The RUGGOs should be amended to require that regional and town centers be reassessed by June of 1995 to determine whether additional households and employees are needed to function as described. Increases in assignments to centers should be taken from Urban Reserve and/or Neighbor City assignments.

This recommendation is consistent with our request in the July 26 memorandum to Focus Growth in Centers and Through Redevelopment.

III In our July 25 Memorandum, the state suggested that fewer than four cities be designated neighbor cities, and that population allocations range from 10 to 20,000 persons to each designated city. The Recommended 2040 Concept allocates 30,000 households (66,690 persons) to three cities, at an average of 22,230 persons to each city. (30,000 households are 13.5% of the households not accommodated in the current UGB by existing local plans.) The recommended alternative is within the four cities requested by the state, but the average population allocated slightly exceeds the state request. We remain concerned that substantial growth in neighbor cities will have greater adverse effects than focused growth within the Metro UGB if the growth is dependent on employment within the Metro UGB.

The state also commented on the need for carefully constructed agreements between Metro and neighbor cities regarding the management of growth inside and outside the respective urban areas. The RUGGO amendments contain three concept for inclusion in the such cooperative agreements. We concur with these concepts and recommend inclusion of these additional concepts:

4) that new development densities and patterns in neighbor cities, while designed to meet local opportunities and constraints, match the efficient use of land that town centers, neighborhoods, corridors and multi-modal transportation systems portray in the Metro 2040 Concept.

5) that the level of population and employment allocations to each neighbor city be reevaluated following completion of the combined urban reserve analyses for the neighbor cities and Metro in 1995.

Concept three in the RUGGO amendments addresses jobs and housing balance. We believe that jobs and housing balance is critical in neighbor cities to maximize public infrastructure investments, reduce vehicle miles of travel, and to create viable, attractive alternatives for metropolitan living. For this to occur, a sixth concept for RUGGOs is recommended:
6) that the state and Metro work with neighbor jurisdictions to establish cooperative strategies to achieve jobs-housing balance targets before expansion of the urban growth boundary.

These recommendations are consistent with our request in the July 26 memorandum for the Neighbor City Concept: Small Allocations, Tight Agreements

IV Jobs and housing balance was found by Metro's evaluation of growth concepts to be a key link to efficient use of land and transportation services. We understand that the Recommended 2040 Concept therefore relies heavily on such balance, both regionally and in selected subareas of the region. We concur with this emphasis, but add the following.

It is not enough simply to achieve jobs-housing balance if incomes and housing prices do not reasonably equate. When incomes and prices are out of balance, commuting trips and distances likely will increase. This condition in turn will tend to add to congestion. Therefore, we recommend this amendment to the RUGGOS: when a major subarea of the region experiences both protracted congestion and jobs (income)-housing price imbalance, then affordable housing incentives and policies, such as minimum density zoning, should be enacted and implemented.

This recommendation is consistent with our request in the July 26 memorandum for Jobs-Income-Housing Balance Using Regional Policies and Agreements.

V We are pleased to see some reduction and redistribution of the Employment Areas in the Recommended 2040 Concept. However, we remain concerned that many of the mixed-use employment areas are without the services of a multi-modal transportation system that the mix and intensity of uses in these areas warrant. We recommend therefore that RUGGOS direct the RTP to adopt refinements that increase modal choice to the designated employment areas.

This recommendation is consistent with our request in the July 26 memorandum to Limit Mixed Use Employment Areas and Serve Them With Multi-modal Transportation Systems.

VI The Recommended Alternative documents pertaining to the proposed adoption in December 1994 do not address the issue of phasing: what has to occur when to ensure orderly progress toward the desired future. For example, not all centers, transit lines, neighborhoods, etc. can develop simultaneously at an equal pace. Successful implementation of the 2040 concept depends upon determining how and when to institute new regulations, phase infrastructure improvements, and promote development consistent
with the Recommended Alternative. Phasing plans should choose which aspects of the Recommended urban form to foster now versus later and ensure that adequate public facilities and services are available to accommodate the proposed higher density within a reasonable time of such development occurring.

We recommend the RUGGOs direct that Metro, in collaboration with local governments and others in the region, establish policies and schedules appropriate to stage and implement each center, corridor and station area. In order for the Regional Transportation Plan to reflect these phasing decisions, phasing should be among the first tasks undertaken in the Work Plan in 1995.

This recommendation is consistent with our request in the July 26 memorandum to Prioritize Development Locations and Determine Phasing.

VII We are pleased to see that modeling of the Recommended Concept indicates that substantial progress can be made towards meeting state and local goals of reducing VMT/CAPITA, mitigating congestion and minimizing airshed impacts. However, the Recommended Concept documents should acknowledge the fact that the VMT targets set forth in the State's Transportation Planning Rule will not be achieved.

We are concerned that there is even a high risk of not achieving the VMT reductions projected for the Recommended Concept, since it has less transit service and more new lane miles than any of the three alternative previously analyzed. As we understand, the Recommended Concept relies on a tenuous assumption that increased density will create market forces that will naturally result in the highest regional parking pricing scenario modeled. If this effect does not occur, very negative impacts with respect to state transportation, land use, and air quality goals could result.

We recommend that the following language be added as a RUGGO amendment to insure that this issue is prominently recognized by Metro and local governments and positively addressed. Add a third paragraph under "Transportation Facilities", Page 42 of RUGGO's: **A key assumption of the Recommended Concept in addressing multi-modal targets, congestion, and airshed carrying capacity is that market forces will significantly increase parking constraints on a regional basis as density increases. Should this not occur local governments would need to impose some specific program(s) to produce a similar effect. In addition, other demand management and transportation system management programs will be needed to further reduce single occupancy vehicle travel beyond projections of the Recommended Concept to fully meet the State Transportation Planning Rule requirements.**

We also believe the region must rigorously investigate and implement a combination of demand management, system management,
and pricing techniques as a first course of action prior to making major capacity improvements in the transportation system.

Whereas we encourage the construction of new local streets which contribute to an interconnected, multimodal street system, we discourage major capacity improvements to the arterial and highway system without first pursuing the measures indicated above. By so doing, we can meet the goals of the Recommended Concept in a more cost-effective and efficient manner.

VIII Recognition of the important freight movement function of the roadway system is of high importance. Some attention is paid to this function in the Recommended 2040 Concept. We recommend some additional specific amendments to the RUGGOS as follows:

ADD 14. vi. Accommodates freight movement to, around, and through the Metro area and protects and enhances intermodal facilities.

ADD 14.3.4 Promote a balanced freight system which enhances the inherent efficiencies of each mode.

IX Congestion remains a problem in the Recommended Concept, especially in portions of the region. As we noted in the July 26 Memorandum, congestion cannot be completely avoided. It will be necessary however to utilize available means to minimize congestion. We recommend therefore an amendment to RUGGOS as follows: An interconnected network of well-designed, multi-modal urban arterials, collectors, and local streets is essential to efficient development of the urban area to provide effective access to regional centers and town centers from the neighborhoods surrounding them, and to relieve intercity, state and federal highways from the congestion caused by local traffic.

This recommendation is consistent with our request in the July 26 memorandum to Reduce Congestion: Improve Street Grids, Use Demand Management Measures, Employ Parking and Congestion Fees.

X The RUGGOS adopted in 1991 accurately portrayed the state's role in implementing Region 2040 as participating with, and advising, our regional partners and cooperatively developing implementation strategies (4.5, Role of the State of Oregon). Section 4.5.3 of the proposed amendments states that our role is to

Modify state plans, regulations, and activities to insure coordination with the regional framework plan and functional plans adopted by Metro, and direct state programs toward implementation of these goals and objectives and the regional framework plan.
The state is committed to working with Metro to establish a memorandum of understanding outlining our role in Region 2040 implementation. Such an agreement could specify measures State agencies would agree to undertake to implement a regional vision that achieves State objectives. However, the statement identified above is too directive for regional policy language. We recommend that this statement be removed.

This recommendation is consistent with our request in the July 26 memorandum to Reduce Congestion: Improve Street Grids, Demand Management, Parking and Congestion Fees.

RECOMMENDATIONS FOR CONCEPT MAP AMENDMENTS

I Transit corridors which have not been the focus of detailed alternatives analysis should be designated High Capacity Transit rather than light rail transit. Until a corridor is studied in detail we do not know the best way to serve a particular urban form. We recommend that the following "proposed Light Rail Lines" on the Concept Map be changed to "Potential High Capacity Transit Routes".

* LRT extension to the airport
* Oregon 99E and I-205
* Oregon 99W (Barbur Blvd)
* Oregon 217
* Proposed alignment through Central Eastside Industrial Area

The state is interested in working with Metro and other regional partners during preparation of the RTP to establish performance measurements to guide investments in future light rail transit lines.

RECOMMENDATIONS FOR THE REGIONAL WORK PLANS

I We wonder whether the region can support six regional centers. It is our understanding that during the first six months of the Region 2040 implementation schedule the feasibility of each regional center will be evaluated. Specific boundaries and the actions required to create the centers will be prepared for those determined to be feasible. The results of this work will help define the transportation network needed in the Regional Transportation Plan. We support this phase of the work plan and recommend that it remain in the work plan.
II The 2040 Concept allocates household and employment growth to three neighbor cities. Growth also may be spurred in other cities within commuting distance of the Metro region. We recommend that the Region 2040 Work Plan engage Metro with the state and other neighbor cities, counties and service providers to develop intergovernmental agreements establishing population and employment allocations, defining growth management roles for each agency and jurisdiction, and coordinating transportation systems.

III A clear delineation of urban and rural areas and uses must be evident in the region's plans, with a strong access management plan that severely restricts access along transportation corridors outside designated urban areas. While the state has an adopted access management policy, efforts to implement it are often met with extreme opposition from local governments, business interests, and property owners. Successful implementation of an access management plan will require coordinated access management components in state, regional, and local plans.

We recommend therefore that the RTP include an access management element which prescribes access management standards for different types of transportation facilities. The RTP access management policy would provide guidance to local jurisdictions as they prepare local transportation system plans.

IV Metro and the state have resources and tools that can facilitate achievement of the Recommended 2040 Concept involving neighbor cities. Such efforts should include an economic development component that targets neighbor cities for jobs as well as housing opportunities; neighbor city density standards and development patterns akin to those in the Metro UGB; and multimodal transportation systems.

We recommend that in early 1995 Metro conclude with the state an Understanding on mutual implementation measures and that Metro commit to using a portion of its resources, such as allocating transportation dollars, and creating implementation tools to facilitate the preferred development pattern in neighbor cities.

V All of the terms describing elements of the urban form need more definition to clearly articulate what they are and what they are not. The definitions need to be specific enough to guide development of the various elements of the Region 2040 Framework Plan (Regional Transportation Plan, Land Use Plan, etc.) which, in turn, will guide local plans and actions. We encourage adoption of the RUGGOs in December, but recommend that the Work Plan include provisions to define more clearly these important terms during the first few months of 1995. (Examples of terms in
need of further definition: Mixed-Use Employment, Neighborhood Centers, Neighborhoods, Transportation Facilities and Regional Centers)
November 3, 1994

John Fregonese  
Tom Kloster  
Metro  
600 NE Grand Ave.  
Portland, Oregon 97232-2736

Re: Transportation Elements of the Region 2040 Recommended Alternative

Dear John & Tom:

The following are comments by 1000 Friends of Oregon on the transportation portions of the 2040 Recommended Alternative, as described in the September 1994 Recommended Alternative Decision Kit. Please include these comments in the record and please distribute them to relevant staff, committee members (including members of the Joint Policy Advisory Committee on Transportation) and the Metro Council.

Overall, 1000 Friends supports many of the transportation elements in the Recommended Alternative. There are, however, several areas requiring further attention.

Auto Dominance

First and foremost, the Recommended Alternative is too dominated by the automobile. Under Concept A, transit would account for 4.04% of all person trips, and walking and bicycling for 5.17%. Under the Recommended Alternative, transit increases to only 6.31% and walking/biking to only 5.74%. These minor increases are hardly worth all the effort required to implement the Alternative. With only 570,007 riders per day in 2040, the Recommended Alternative misses, by a significant degree, the Tri-Met Strategic Plan’s goal of 690,000 riders by 2005.

We believe that the Alternative needs to provide vision, leadership, and greater social and environmental equity. To those ends we recommend that the Alternative be amended to achieve a scenario in 2040 where only half of the region’s work trips are made in single occupancy automobiles. Furthermore, the RUGGOS should be amended as follows:

"[14]13.3. Transportation Balance. Although the predominant form of transportation is the private automobile, planning for and development of the
regional transportation system should seek [shall be designed] to:

[14]13.3.1. reduce automobile dependency, especially the use of single-occupancy vehicles [to no more than half of all work trips regionwide]."

This objective, while aggressive, is achievable, as evidenced in the work completed by 1000 Friends of Oregon for its study titled "Making the Land Use, Transportation, Air Quality Connection" (LUTRAQ). Using Metro’s modeling system, 1000 Friends showed that in 2010 residents of new pedestrian/bicycle/transit friendly neighborhoods built within walking distance of transit in Washington County would rely on single occupancy automobiles (SOVs) for only 49.6% of their work trips. See Attachment 1. Given that LUTRAQ’s time frame is only 2010, it is reasonable to establish a goal of no more than 50% SOVs by 2040.

The achievability of this goal is further bolstered by the fact that the current model system is widely believed to under-represent walking and bicycling as modes of travel. As reported by 1000 Friends in the Interim Report for the LUTRAQ Project:

The Portland model is based on a 1985 travel survey. Since this survey was designed to support traditional modeling efforts in the Portland area, walk and bike trips were not a primary concern. It appears that compared to some surveys in other areas, walk and bike trips may have been underreported in the Portland survey and are therefore underestimated in the Portland model.

See Attachment 2. Because walking and biking are under-represented in the model, we are actually closer to achieving a 50% SOV goal than current numbers would suggest.

Transit Access

Second, the Recommended Alternative provides direct access to transit to only 63.16% of the intra UGB households. This is, in fact, a decrease from the current level of 64.75%. As a goal, transit access should be universal throughout the entire region. Without a "level playing field" for access to all modes of travel, hopes of substantially reducing reliance on the automobile will be dashed.

Universality of access to transit can be accomplished by a number of means, including greater concentration of development into fixed route transit corridors, increasing the number of fixed route transit lines, improving pedestrian and bicycle connections to fixed route transit lines, and providing a base level of demand responsive transit to those areas not served by fixed route transit.

We urge Metro to rework the alternative to achieve 95+% transit coverage, and to make the following revision to the RUGGOs:
"[14]13.3. Transportation Balance. Although the predominant form of transportation is the private automobile, planning for and development of the regional transportation system should seek to:

* * * * *

[14]13.3.2. increase the use of transit through both expanding transit service and addressing a broad range of requirements for making transit competitive with the private automobile, including making transit accessible by at least 95% of the region's households;"

Regional Through-Routes

Third, the proposed language for regional through-routes states that these facilities "are seldom conducive to bicycles or pedestrians because of the volume of auto and freight traffic they carry." While we would agree that this statement accurately describes current conditions, we feel it is inappropriate as a planning objective for the next 50 years. Regional through-routes are all passing through areas where people live and work. Recognizing their importance to the region, these facilities need to become better neighbors. One of the ways to achieve this is to take the steps necessary to make them conducive to bicycles and pedestrians. Furthermore, in the case of bicycles, such routes are important for providing direct routes to important destinations. Hence, we recommend that the language be amended as follows:

"These major routes frequently serve as transit corridors and should be designed to accommodate and encourage safe bicycle and pedestrian use as well. but are seldom conducive to bicycles or pedestrians because of the volume of auto and freight traffic they carry."

The same section states: "With their heavy traffic, and high visibility, these routes are attractive to business. While they serve as an appropriate location for auto-oriented businesses, they are poor locations for businesses that are designed to serve neighborhoods or sub-regions." This statement appears to conflict with other language in the section noting the importance of these routes for freight traffic and the need to avoid excessive congestion. As Bend's experience with Highway 97 amply illustrates, allowing auto-oriented businesses to locate next to a regional through-route threatens the continued viability of that facility. If the region is serious about protecting through-routes for freight, it needs to restrict or eliminate the possibility of further auto-oriented development along these routes. To this end, we recommend the following amendments:

"With their heavy traffic, and high visibility, these routes are attractive to business. [However, given the importance of these facilities to freight movement, and the negative impacts that auto-oriented businesses tend to have on congestion levels for these facilities, regional through-routes are inappropriate locations for auto-oriented businesses.] While they serve as an appropriate location for auto-oriented businesses, they are poor locations for businesses that are designed to serve..."
Collectors and Local Streets

Finally, we support the language in the section on collectors and local streets urging a better connected streets system. Our report on "The Pedestrian Environment" corroborates the importance of this issue by correlating the presence of interconnected streets systems with higher mode shares for walking, bicycling, and transit ridership. See Attachment 3.

Our concern with this section is with the RTP standards that is proposes. The proposed language calls for an RTP standard of eight to ten through streets per mile. The places in "The Pedestrian Environment" report that had the highest transit and walk/bike mode shares, however, had street densities of approximately 18 to 20 per mile. Although we were not able to conduct sensitivity analyses on street densities, we are concerned that the eight to ten streets per mile will not be sufficient. "The Pedestrian Environment" demonstrates that 18 to 20 streets per mile provides a good environment for pedestrians, bicyclists, and transit riders. Will something less than 18-20/mile provide as good an environment? We know from the Metro 1985 Household Travel Survey that as distance to transit increases, transit ridership decreases. See Attachment 4. We also know that as block sizes increase (i.e., the number of streets/mile decrease), the distance to transit for many households increases. This leads us to recommend that the street density standards be 18 to 20 streets/mile, rather than the 8 to 10 streets/mile that is in the proposed language:

"The RTP should consider a minimum standard of eighteen to twenty through streets per mile, applied to developing or undeveloped areas, to reduce local travel on arterials."

Conclusion

We appreciate the opportunity to comment on the transportation elements of the Region 2040 Recommended Alternative. We plan to submit additional comments on other transportation issues, as well as other aspects of the Recommended Alternative, in the near future.

Very truly yours,

Keith A. Bartholomew,
LUTRAQ Project Director
Mode Shares: Western Bypass Study Area

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Making the Land Use Transportation Air Quality Connection

The LUTRAQ Alternative/Analysis of Alternatives
An Interim Report

Prepared by
Cambridge Systematics, Inc.
Calthorpe Associates
with Parsons Brinckerhoff Quade and Douglas, Inc.

October 1992

Major funding provided by
The Energy Foundation
The Nathan Cummings Foundation
Federal Highway Administration
United States Environmental Protection Agency
Adjustments to Model Outputs for Walk/Bike Trips

Most transportation planning models, including Portland's, are designed to develop data for motorized modes (auto, transit) only. Walk and bicycle trips are not usually important outputs for most applications since the bulk of transportation investment is in highway or transit projects. Hence, model calibration and validation efforts generally concentrate on the auto and transit modes.

The LUTRAQ alternative, however, focuses in part on the pedestrian and bicycle environment of new developments. Walk and bike trips are important measures of the performance of the alternative, and the traditional modeling focus on motorized trips must be expanded to include them. The model enhancements developed during the LUTRAQ study, including measures of the pedestrian environment and development density, are designed to, in part, refocus the model on these non-motorized travel modes. These enhancements, however, only partially correct existing modeling biases against walk and bike travel.

The Portland model is based on a 1985 travel survey. Since this survey was designed to support traditional modeling efforts in the Portland area, walk and bike trips were not a primary concern. It appears that compared to some surveys in other areas, walk and bike trips may have been underreported in the Portland survey and are therefore underestimated in the Portland model. This shortcoming has not significantly affected previous model applications for the planning of transportation projects in the area since these projects have not focused on non-motorized trips. It is felt that, for the most part, the missing walk/bike trips are not susceptible to shifts to other modes due to changes in service characteristics, especially considering that they are predominantly short trips and may not have been made were the walk and bike modes unavailable. It appears that the reintroduction of the unreported walk trips into the model would have little effect on auto and transit related outputs including traffic volumes, vehicle miles and hours of travel, and transit ridership.

This section describes the underreporting of walk/bike trips in the Portland survey, other areas in which the Portland model underestimates walk/bike trips, and the adjustment procedures adopted to address these issues.

Underreporting of Walk/Bike Trips in the Portland Travel Survey

To determine the degree of underreporting of walk/bike trips in the Portland survey data, the Portland data were compared to San Francisco Bay area survey data as reported in “The Effect of Neo-traditional Neighborhood Design on Travel Characteristics” by Jack Peers et
The Pedestrian Environment
Volume 4A

Prepared by
Parsons Brinckerhoff Quade and Douglas, Inc.
with Cambridge Systematics, Inc. and Calthorpe Associates

December 1993

Major funding provided by
The Energy Foundation
The Nathan Cummings Foundation
Federal Highway Administration
United States Environmental Protection Agency
Summary

This report analyzes the connection between land use patterns and household travel behavior in the Portland area. Data from the 1985 home interview survey conducted by Metro (the Portland area regional government) as well as results from the regional travel forecasting models and land use information were used to test the hypothesis that travel behavior is affected by neighborhood land use patterns. Special attention was given to the quality of the pedestrian environment as gauged by the Pedestrian Environment Factor (PEF), a composite measure of "pedestrian friendliness".

The first part of this report examines and quantifies the relationships between household travel mode choices and the following variables — quality of the pedestrian environment, residential density, transit level-of-service, and proximity to employment activity. In addition, variations in the quantity and length of vehicle trips were examined. The results of this exercise confirm the direct correlation between the use of pedestrian and transit travel modes and the land use variables identified above. As expected, residents in neighborhoods with higher density, proximity to employment, grid pattern streets, sidewalk continuity, and ease of street crossings tend to make more pedestrian and transit trips, whereas residents of more distant, lower density suburban areas with auto-oriented land use patterns show extensive reliance on the auto.

In the second part of this report, multiple regression techniques are employed to confirm statistically the hypothesis that these land use variables do in fact impact household mode choice decisions. Regression models were developed to explain both daily household vehicle miles traveled (VMT) and vehicle trips generated. Although constraints in the level of detail and variability in the available data limit the overall explanatory power of these models, the land use related variables, including the PEF, are shown to significantly impact both household VMT and the number of vehicle trips.

Specifically, the models suggest that a 10% reduction in VMT can be achieved with a region wide increase in the quality of the pedestrian environment to a level comparable to that currently available on Portland's most pedestrian-oriented zones today. These zones form a larger contiguous area with densities supportive of transit, land use mixes which reduce auto use, and an orientation to the needs of pedestrians, as more fully described in this report. These findings are consistent with results of simulations conducted for the LUTRAQ project, described in "The LUTRAQ Alternative/Analysis of Alternatives: An Interim Report" (October 1992).
### Distance from Transit/Mode Split

#### Home Based Work Trips

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**Source:** 1000 Friends of Oregon

**Data Source:** Metro 1985 Household Travel Survey
DATE: September 14, 1994
TO: Keith Bartholomew, 1000 Friends of Oregon
FROM: Kyung-Hwa Kim, Senior Transportation Planner
CC: Dick Walker, Jennifer John

Per your request, I am faxing you two pages of the mode share summaries by transit accessibility from the 1985 Household Travel Survey and the Region 2040 project. The 1985 Household survey question was "How far is your house located from the closest bus station." The 1985 summary is based on the block information. The Region 2040 project information is based on the year 1990, the preferred 2040 the alternative and 2040 concept B scenario's zonal trip numbers by transit accessibility.

If you have any questions about the 1985 survey, please give me a call at 797-1773. If you have a question about the Region 2040 information, please call Jennifer John at 797-1807.
### Home-Based-Work Trip

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Total | 178770 | 100.00 |

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by badist: tab mode6 (w=defact)

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November 10, 1994

JPACT
c/o Metro
600 NE Grand
Portland, OR 97232

Dear JPACT members,

During the past few months, our organization has discussed at length the Metro 2040 Concept and the Recommended Alternative. While most of our concerns were satisfactorily addressed at the TPAC level, we feel it's important for us to convey to you our group's interest in this issue.

The metro region, as a result of its strategic location on the West Coast and Pacific Rim, is a major transportation hub for commodities originating as far as Chicago to the east and Asia to the west. Portland is the second largest warehousing and distribution center on the West Coast, outdistancing Seattle, San Francisco and San Diego. This tremendous goods-movement activity is a major factor in our region's economic vitality. Maintaining that position in the future will depend on the ability of freight to move easily and quickly between the various transportation modes within the Portland area.

The 2040 Commodity Flow Analysis, commissioned by Metro, indicates that during the next 46 years our region's overall freight volume will double. That's a faster rate than the projected population growth for the same time period.

Without question, it's imperative we adopt transportation and land-use policies that enhance the future efficiency of the freight-movement industry. In fact, because of the impact goods movement has on our economy and quality of life, freight should receive equal consideration during the development of transportation system needs and the programming of projects.

Freight movement in this region is supported by public and private infrastructure that work in combination. Maintaining current access to freight facilities and preserving current service levels will require significant investment in transportation facilities and capacity improvements. Opportunities must be sought to maximize investments in both the public and private sector through partnerships, cooperation and creative solutions.

We must also be realistic about the needs of the public components of the freight system. Because of the significant projected growth of freight, investments in public transit alone will not adequately address freight mobility needs. We still must make major investments in public facilities, particularly roads and bridges.

In addition, we need land-use policies that support freight mobility and ensure that a sufficient supply of land is appropriately designated to allow for growth of intermodal facilities. Maintaining and improving access to intermodal facilities also is critical for enhancing connectivity.
Finally, development of communication outreach programs is essential for fostering private-public partnerships. Public planning for freight movement cannot be conducted in the same manner as that done for people movement. Many elements of successful freight mobility are driven by private sector activities and investments — over which the public sector has limited control. Meanwhile, well-intentioned, but uninformed, public officials can institute regulatory controls and taxing schemes which inadvertently impede goods-movement efficiency, ultimately costing the consumer and our economy. Consequently, it's crucial that the public and private sector work closely to develop practical and productive freight policies for our region. Certainly, the members of the Intermodal Council will gladly work toward that end.

Thank you very much for your consideration of our comments. Please do not hesitate to contact us for any additional information or explanation.

Sincerely,

Pamela Reamer-Williams
Chair, Intermodal Transportation Council
ADDENDUM TO ATTACHMENT 'B'

JPACT DISCUSSION ITEMS

1. Comment: Include a general introduction that outlines the context of the 2040 decision (TPAC discussion).

TPAC Recommendation on Comment 1: Agree; recommend that language be added as an introductory paragraph in the "Transportation Facilities" section on page 42 of the RUGGO amendments (proposed TPAC language shown in Attachment B).

Metro Staff Recommendation on Comment 1: Agree, but with the following language shown in bold that clarifies the proposed TPAC language:

In undertaking the Region 2040 process, the region has shown a strong commitment to developing a regional plan that is based on greater land use efficiencies and a truly multi-modal transportation system. The transportation system defined in the growth concept serves as a theoretical construct that attempts to serve the Recommended Alternative urban form. The modeled system reflects only one of many possible configurations that might be used to serve future needs, consistent with the policy direction called for in the amendments to RUGGO.

As such, the Recommended Alternative network transportation map provides only general direction for development of an updated Regional Transportation Plan (RTP), and does not prescribe or limit what the RTP will ultimately include in the regional system. Instead, the RTP will build upon the broader land use and transportation directions that are defined in the Recommended Alternative.
WASHINGTON
COUNTY, OREGON

November 2, 1994

To: Metro Council
    JPACT
    MPAC
    Metro Planning Committee

From: Brent Curtis, Planning Manager

Subject: REGION 2040 - TRANSMITTAL OF WASHINGTON COUNTY BOARD OF COUNTY COMMISSIONERS' TESTIMONY

On November 1, 1994, the Washington County Board of Commissioners (Board) discussed at its public meeting the Region 2040 Recommendation. The Board authorized and directed me to transmit their recommendations and comments regarding Region 2040.

Please find attached the required forms for amendment considerations. Also please note the Board has provided two sets of recommendations:

A. The majority of the Board represented by Chairman Hays, Commissioners Christy and Katsion; and

B. A minority recommendation/comment by Commissioner Peters.

Please note Commissioner Rogers was not available for the Board action.

cc: Board of County Commissioners
    Charles Cameron, County Administrator

BC/lt

(j: bc-mpac.d)
To: Metro Council
Metro Planning Committee
MPAC
JPACT

From: Board of County Commissioners

Subject: **RECOMMENDATION: REGION 2040 RECOMMENDED ALTERNATIVE**

The Metro Council, the Metro Executive and the Metro staff are to be commended for their commitment in undertaking the Region 2040 process, their commitment to detailed, sophisticated technical analysis, and the high priority they placed upon public information and public involvement as a significant contributor to the Region 2040 planning process.

The Metro Executive's Region 2040 Recommended Alternative is also to be commended for its synthesis of a broad range of alternatives, public opinions and very technical policy imperatives into a long range urban form which depends upon greater land use efficiencies and densities served by a truly multimodal transportation system.

Washington County is in agreement with the general growth concept as described in the Executive Recommendation. We support the distinction between urban and rural lands and the need to reduce sprawl. We agree with the bolstering of mixed use centers inside the urban growth boundary and recognize the important role they serve in the Growth Concept. We also support the mix of housing and employment in compact areas that are accessible to transit.

We recognize how important the Region 2040 decision is to Washington County and have spent considerable time working with Metro staff on the Region 2040 project. Likewise, Washington County has put considerable effort into coordinating technical and policy analysis through work with the Washington County Coordinating Committee, the Washington County Managers Group, the Washington County Planning Directors Group, and the Washington County Public Officials Caucus.

Washington County is supportive of the policy direction and approach of the Metro Executive's Region 2040 Recommended Alternative. Our support comes with the following recommendations:
1. Washington County supports the philosophy of greater land use efficiencies in development and redevelopment with a focus on centers and corridors for organizing such greater land use efficiencies. Washington County supports also the resultant need for relatively fewer land additions to the UGB and a more rigorous urban growth management process.

2. Washington County recommends a three step adoption-refinement-readoption process which would provide for Metro decision-making in December, 1994; June, 1995; and December, 1996 (please refer to Attachment One). The second and third steps of the three step process should be viewed as refinement opportunities. The three step adoption-refinement-readoption process would be tied closely to a carefully defined work program describing priority planning analysis necessary to ensure timely decision-making while ensuring sufficient local government review and participation time.

3. Washington County recommends additional regional and local government analysis regarding the feasibility of achieving the land use efficiencies, densities and degree of redevelopment the Recommended Alternative assumes, prior to formal adoption as a binding land use ordinance. Washington County recommends the adoption of the Regional Growth Concept and associated regional planning lexicon by resolution in December, 1994. Likewise, Washington County recommends adoption of the Region 2040 Growth Concept Map by resolution in December, 1994. Adoption by resolution will clearly mark the Metro Council's Region 2040 decision as a timely resolution of two years of planning while remaining open to additional analysis which will refine and sharpen the concept for readoption as recommended in the three step adoption-refinement-readoption process.

4. Washington County recommends adoption of the Growth Concept and Growth Concept Map by resolution for two additional reasons:

   A. Many local governments have requested additional time to undertake local technical and public review of the Recommended Growth Concept and Map. Adoption by resolution, coupled with a work program and the recommended three step adoption-refinement-readoption process would serve to respond to the requests from local government and Metro's LCDC Goal 2 coordination responsibilities.

   B. The Metro planning analysis and public attention has focused upon alternatives analysis which compares, contrasts and generally instructs all involved in the performance of one alternative as compared to another. This analysis has focused upon preparing a recommended alternative. The Recommended Alternative needs a more formal and detailed planning and legal analysis regarding the conformance of the Recommended Alternative with the Oregon Revised Statutes, the LCDC
Goals and associated Oregon Administrative Rules, relevant case law, federal requirements, the RUGGOs and the RTP. It is inappropriate to adopt by ordinance and as a land use decision a growth concept and map absent detailed findings and conclusions regarding compliance with all relevant state and regional planning requirements.

5. Washington County recommends, immediately following the December, 1994 resolution adoption, additional technical analysis and public review be undertaken to determine the feasibility and required policies necessary to ensure the Region 2040 Recommended Concept and Map is achievable. The Recommended Concept and Map depends upon substantial infill and redevelopment to create a much more efficient use of existing urban lands. The degree to which such an approach is successful will dictate the extent to which additional lands will need to be added to the UGB. The additional analysis during the second step refinement phase of the recommended three step process, will provide an opportunity to define in a much more precise way the need for additional urban land as required by Goal 14. It is inappropriate to decide in a formal, precise and definitive manner the amount of land needed for addition to the UGB until greater certainty is attained regarding infill and redevelopment.

6. Washington County supports the recommendation to narrow to a defined set of lands for inclusion as Urban Reserve Study Areas. Washington County recommends support of judicious inclusion or exclusion of additional land to the Urban Reserve Study Area as may be recommended and justified to Metro by local government and the public during the current adoption process. The Urban Reserve Analysis should be conducted in an expeditious manner leading to final Urban Reserve determination and designation within six months. The analysis should be conducted simultaneously with the infill and redevelopment analysis and refinements.

It is further recommended that the analysis determine how much farm land needs to be maintained in order to assure the continued viability of the agricultural economy, including agricultural suppliers, agricultural processors, and providers of farm equipment. Final designations of urban reserves must be based upon data that permit decision makers to balance conflicting identified needs for both urban and agricultural land.

7. The Rural Reserve concept should be amended to conform with the prior "Greenbelt-Green Corridor" concepts associated with maintaining permanent "green" non-urban separation between the existing urban area and surrounding neighboring urban areas. The Rural Reserve concept lacks the more strategic and focused policy imperative of the "Greenbelt-Green Corridor Concept."
8. Washington County strongly supports the Growth Concept's two premier transportation policies:

   A. To develop a true multimodal transportation system to serve land use patterns, densities and community designs which allow for and enhance transit, bike and pedestrian travel opportunities; and

   B. Jobs-housing balance at the regional level, county level and community level.

9. Washington County notes the land use and transportation systems for central and eastern Washington County currently produce inadequate mobility. This area requires continued analysis and system adjustments to ensure adequate transportation system performance. Washington County recommends central and eastern Washington County be noted as a Study Area on the Concept Map and text. Additional study is required to develop an adequately performing transportation system to match the proposed land uses. It may be necessary to modify the proposed land uses and location of design elements should development of an adequate transportation system become impossible.

10. Washington County recommends the Metro staff be directed to prepare and deliver draft Year 2020 population and employment projections/allocations. In addition to refining the Region 2040 Concept in Step Two of the three step adoption-refinement-readoption process, the Regional Transportation Plan, subsequent local transportation system plans and conforming local government land use plans require a twenty year planning horizon as compared to the 40+ year planning horizon of Region 2040. It is imperative for timely completion of such plans to begin to develop Year 2020 population and employment allocations.

11. The Step Two refinement planning process should continue to examine and refine planning analysis and conclusions regarding industrial lands. Additional analysis and consideration regarding the relative importance of industrial land in providing employment opportunities is required. Likewise, additional consideration of industrial land and the degree such lands may be over- or under-designated in the Concept will contribute to a necessary refinement in the amount of land needed for urbanization.

12. Washington County recommends that Metro involve representatives of School Districts in the Region 2040 planning process. It is important that Metro take into serious consideration the ability of schools to accommodate and/or plan for projected increases in student enrollments.

13. Washington County recommends the Metro staff prepare, and the Metro Council adopt, a detailed work program consistent with the recommended three
step adoption-refinement-readoption process. The work program should detail planning analysis and local government and public review opportunities for

- Urban Reserves
- Regional Transportation Plan
- Future Vision
- Regional Framework Plan

14. Washington County recommends the RUGGOs and Region 2040 develop and include a monitoring system, specific performance indicators and a systematic review process.

15. Washington County recommends the following language be appended to the third paragraph defining Regional Centers in the proposed RUGGO amendments (page 39):

   Each Regional Center will be unique, exhibiting its own characteristics and responding to varying market and local needs. The amount and specificity of development will vary between Regional Centers, reflecting the diversity of function and location.

16. Washington County recommends the following language be appended to the second paragraph defining Town Centers in the proposed RUGGO amendments (page 39):

   Each Town Center will be unique, exhibiting its own characteristics and responding to varying market and local needs. The Regional Framework Plan will reflect this diversity in establishing Town Center guidelines.

17. Washington County recommends the following language be appended to the paragraph defining Corridors in the proposed RUGGO amendments (page 39-40):

   Corridors will have varying characteristics throughout the region. The Regional Framework Plan will reflect these differences in the establishing of Corridor guidelines.

18. Washington County recommends the following language be inserted into the paragraph defining Industrial Areas in the proposed RUGGO amendments (page 41):

   Industrial Areas would be set aside exclusively for industrial activities and non-residential supportive activities required by industrial uses.
19. Washington County recommends the following language be inserted into the paragraph defining Collectors and local streets (page 43):

The RTP should consider a minimum standard of eight to ten through streets per mile except along regional through streets, applied to developing or undeveloped areas to reduce local travel on arterials.

Specific "2040 Growth Concept" Map Changes:

20. Washington County recommends that three additional Urban Reserve Study Areas be included (please refer to Attachment Two);

1. Evergreen West area
2. Elsner Road / Beef Bend Road area
3. St. Mary’s Property

21. Washington County recommends modification of three of the identified Corridors to reflect the alignments of future or existing roadways as designated on the Washington County Transportation Plan Functional Classification System map;

1. Cornell Road between Cornelius Pass Rd. and Stucki Ave. (future)
2. Springville Road (existing)
3. Barnes Road west of Cedar Hills Blvd. (future)

22. Washington County recommends deletion of five of the identified Corridors. These corridors are located along arterials in primarily residential areas that are substantially developed and provide very limited opportunities for future development and increased densities;

1. Garden Home Road
2. Bethany Boulevard between Sunset Highway and West Union Rd.
3. Boones Ferry Road south of Sagert Rd.
5. Scholls Ferry Road between Washington Square and Beaverton-Hillsdale Highway

23. Washington County recommends the deletion of portions of two identified main streets. These streets are arterials with traffic volumes in excess of those that would allow for the development of slow traffic, pedestrian friendly environment presumed in the main street concept;

1. Cornell Road between 143rd Ave. and Barnes Rd.
2. Farmington Road west of Murray Blvd.
24. Washington County recommends the addition of two main streets which, due to what we believe to be a mapping error, are not clearly identified on the "2040 Growth Concept" Map;

1. N. Adair Street between 19th Ave. and 9th Ave. (Cornelius)
2. Pacific Avenue between Douglas Ave. and Main St. (Forest Grove)
ATTACHMENT ONE

MTAC RECOMMENDED ADOPT-REFINE-READOPT PROCESS

STEP ONE

DECEMBER 1994 (2040)
CONCEPT MAP
URBAN RESERVES STUDY AREA
RUGGO TEXT (% of growth)
URBAN RESERVE STUDY AREA
DENSITIES BY PLAN CATEGORY
2020 POP/EMP NUMBERS
WORK PROGRAM

STEP TWO

JUNE 1995 (2040-2020)
URBAN RESERVES
REGIONAL TRANSPORTATION PLAN (RTP)
DENSITIES BY PLAN CATEGORY
CONCEPT MAP (revisions)
FUTURE VISION
GOAL II RUGGO (% of growth)
ADOPT WORK PROGRAM FOR
REGIONAL FRAMEWORK PLAN (RFP)
URBAN GROWTH BOUNDARY (if necessary)

STEP THREE

DECEMBER 1996 (2020)
RFP DRAFT (6/96)
JURISDICTION SPECIFIC TARGET
SPECIFIC STANDARDS FOR ITEMS OF "METROPOLITAN CONCERN"
Washington County
Geographic Information System

Sheet 1 of 3

Proposed Additional
Urban Reserve
Study Areas

INFORMATION SOURCES
TAXLOT MAP
Cities of Beaverton and Tigard:
Map accuracy - control point positional accuracy is
plus or minus five feet or better.
Data collection scale - 1"=100'

Remainder of region:
Map accuracy - Unknown.
Data collection scale - 1"=100', 1"=200' or 1"=400'

Note: Washington County Assessment & Taxation is
continually updating the taxlot base maps. Some of
the areas displayed in this map may have taxlots created

All data compiled from source materials at different scales.
For more detail, please refer to the source materials or
Washington County Department of Land Use and Transportation.

October 27, 1994
Proposed Additional Urban Reserve Study Areas

- Proposed Urban Reserve Study Area
- Existing Approx. Urban Reserve Study Area
- Proposed Tualatin River NWR

INFORMATION SOURCES

TAXLOT MAP
Cities of Beaverton and Tigard:
Map accuracy - control point positional accuracy is plus or minus five feet or better.
Data collection scale - 1' = 100'

Remainder of region:
Map accuracy - Unknown.
Data collection scale - 1' = 100', 1' = 200' or 1' = 400'

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October 27, 1994
Proposed Additional Urban Reserve Study Areas

INFORMATION SOURCES

TAXLOT MAP
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All data compiled from source materials at different scales. For more detail, please refer to the source materials or Washington County Department of Land Use and Transportation.

October 27, 1994
November 2, 1994

To: Metro Council
   Metro Planning Committee
   MPAC
   JPACT

From: Linda Peters, Commissioner

Re: REGION 2040 RECOMMENDATIONS: MINORITY REPORT

I join the majority of the Board in strongly supporting the growth concept embodied in the Region 2040 Recommended Alternative. I concur with the introductory paragraphs and numbered recommendations 1, 8, 10, 11, 12, 13 and 14 adopted by majority vote of the Washington County Board of Commissioners at yesterday's meeting.

This report is intended to draw attention to two issues which I believe should inform further deliberations on the specific amendments recommended by the Board majority; to raise objections regarding the proposed Urban Reserve Study Area additions; and to comment briefly on several other specific recommendations.

First: These recommendations reflect a very limited public process, principally involving Washington County Land Use staff, elected city officials and planners. While such a "team" approach has much to recommend it, the team did not include several other major Washington County stakeholders. Input from organizations representing citizens outside of cities -- CPO's, the Farm Bureau, etc. -- was not systematically solicited or incorporated into the drafting of these "Washington County" recommendations.

Second, a substantive concern: We must learn how much productive farm land can be converted to urban use without damaging the region's agricultural economic base. This proposal appears in the majority report as the second paragraph of recommendation #6. I proposed this addition to the staff-prepared draft, and I commend my fellow commissioners for approving it.

I raise the issue again here to emphasize its importance as the key missing half of a balanced decision-making process. I'm told that Metro has begun discussion, if not formal study, of the potential impact of farm-to-urban conversions on the viability of remaining ag businesses and the multi-county farm production they currently...
serve. In my view, it's critical that all the partners to decisions about Urban Reserves (and ultimately about Boundary changes) must have reference to data that show both farmland needed to maintain an ag economy and urban land needed to accommodate projected growth. Knowing this, we can thoughtfully balance conflicting needs.

Third, majority recommendation #20 regarding additions to Urban Reserve Study Areas: In general, we should be conservative in identifying Urban Reserve Study Areas because of the point raised above, and because it seems a waste of public resources to study areas that we're pretty sure will fall out under close scrutiny and/or determined opposition.

1. The Evergreen West area, while a popular cause with many Hillsboro-area business and city leaders, is both prime farmland and in the Hillsboro Airport flyway. Not a good prospect for potentially conflicting urban development.

2. Likewise, the Elser Road/Beef Bend Road area has long been controversial in connection with Western Bypass proposals; the opposition to urbanizing that particular farming area is extremely strong and well-organized; I would argue strongly against including it as an Urban Reserve Study Area on both logical and practical grounds.

3. There is more reason to include the entirety of the St. Mary's property -- some of it is already identified, the proposed full-site development would be transit-oriented, mixed use, including affordable housing, the sort of urban design I encourage -- but it also has a history of strong, effective citizen defense against previously proposed urban uses. Iffy.

Finally, my comments on other specific recommendations contained in the majority report:

Majority recommendations 2-5 call for considerable additional study focused on the feasibility of compact, higher density urban design, and in general push for a strong local government role in making final Urban Reserve decisions. I would advocate a more enthusiastic, proactive County commitment to make the preferred alternative work. We can build that commitment as we work through the design issues with our various governmental, citizen-group, and private industry partners. And if all parties know what we are risking when we urbanize farmland, perhaps we can more readily find support for urban design solutions that will, community by community, help us accommodate higher densities and protect our livability.
6. Urban Reserve Study Areas, decisions and timing: If we don't have the farm-economy-impact data we need within six months, we shouldn't be making the decisions within six months.

7. Rural Reserve vs. Greenbelt-Green Corridor concepts: If we know how much productive farmland we need to protect where in order to sustain a viable ag economy, we'll know whether we need major Rural Reserve areas or merely Green Corridors. I suspect it will be the former.

9. Here too I would offer a more proactive County role. With committed, creative leadership from Metro and Washington County, we can work cooperatively with Tri-Met, cities, the business community, and neighborhoods to develop an adequately performing transportation system.

15. - 18. I'm not sure what the proposed language accomplishes that isn't adequately covered elsewhere; certainly the preservation of diverse local character, the sense of place in our communities, is one of the fundamental principles underlying the whole Region 2040 process.

19. What would be the implications of the proposed insertion? Regional through streets with limited access? How does that serve to reduce local travel on arterials?

21 - 24. These may or may not be good recommendations, but they seem to be aimed at reducing change to existing patterns. I expect that there will be changes -- certainly to the current Washington County Transportation Plan, which is out of date and much in need of revision -- based on Region 2040 and subsequent Metro planning decisions. I also expect that these decisions will be informed by much neighborhood input as well as by input from cities and the County.

The Washington County Board has not conducted hearings or otherwise heard from non-governmental stakeholders on the subject of the proposed road alignments, Corridor and Main Street changes. I encourage Metro to look beyond the majority report recommendations for guidance in making 2040 Growth Concept Map Changes.
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