



CRESTWOOD

Neighborhood Association

Crestwood NA Response to the Southwest Corridor (SWC) Steering Committee Locally Preferred Option to Portland City Council 10/10/2018

October 8, 2018

Mayor Ted Wheeler
Commissioners Chloe Eudaly, Nick Fish, Amanda Fritz and Dan Saltzman
Portland City Council
1221 SW Fourth Avenue
Portland, OR 97204

Re: City Council Agenda Item 1062, Southwest Corridor Light Rail Project

Dear Mayor Wheeler and Commissioners Eudaly, Fish, Fritz and Saltzman:

Crestwood Neighborhood Association submitted comments on the Southwest Corridor Light Rail Project Draft Environmental Statement (DEIS) on July 25, 2018 (attached for your reference). The Locally Preferred Alternative (LPA) before you today, and Agenda 1062 staff report, contain new information that we are very concerned about. We are especially concerned that the Resolution language regarding the LPA and workplan will make decisions today before sufficient information and dialogue to resolve some of the outstanding issues detailed in Exhibit C and in our comments.

Crestwood NA believes Metro's SWC Steering Committee (SWC SC) Locally Preferred Alternative (LPA) lacks the vision to support projected growth in our region. We agree with the Portland Planning and Sustainability Commission's July 2018 comments that the DEIS prioritizes motor vehicle movement over people movement, particularly in the vicinity of West Portland Crossroads.

Please

- Support Alignment B1, Center Barbur or unrefined Alignment B2;
- Reject Refinement 2 Taylors Ferry I-5 Overcrossing;
- Amend Refinement 4 Barbur Undercrossing; and
- Amend the LPA preliminary workplan

to design the SW Corridor project in a way that anticipates long-term growth in our region, encourages transit ridership, and protects the safety of everyone who lives in and travels through our neighborhoods.

Crestwood urges you to support Alignment B1 for a number of reasons related to the complex high-crash intersections, motor vehicle traffic congestion and pedestrian and bicycle safety issues within the Town Center known as West Portland Crossroads (Crossroads):

- The Draft Environmental Impact Statement (DEIS) dated June 2018 Table 5.2-2 notes Alignment B1 predicts one-minute faster travel time between downtown Portland and Tualatin or Bridgeport, with similar impact on ridership, displacement and operating costs.
- DEIS Table 5.2-2 notes that Alignment B1 better supports the Barbur Concept Plan than other proposed alignments including Alignment B2.
- The SWC SC LPA (pages 10-11) states the negative impacts of Alternative B1 but does not state any positive impacts. Some of the benefits of rebuilding the existing structure over I-5, in addition to faster light rail travel times, include earthquake resiliency, better safety during winter weather conditions, safer motor vehicle traffic circulation, and safer pedestrian and bicyclist infrastructure so people can safely access transit, shops, services, schools, libraries and parks through the redesigned and reconstructed intersection.
- The existing overcrossing at Crossroads, built in 1959, is highly likely to fail even in a modest Cascadia Earthquake. A new overcrossing that meets current earthquake standards would enable key connections between Portland's emergency responders and Portland Community College, Markham Elementary School, Jackson Middle School, Capitol Hill Library, and residents in SW Portland in the event of an earthquake and other natural disasters.
- The SWC SC LPA (page 11) speculates a possible need to reconstruct the substandard on/off freeway ramps within the Crossroads but does not mention that the 2015 ODOT Barbur Road Safety Audit recommended an intersection safety study and the 2008 Taylors Ferry Road Plan recommended removing the off-ramp, nor acknowledge DEIS comments that support relocating the motor vehicle traffic to other on/off ramps.
- Refinement 4 should also be a Center Barbur alignment to avoid the expense of the "undercrossing" and reap the benefits of the most direct transit time to the proposed station at SW 68th.
- Sidewalks and bike lanes need to be incorporated into any new or reconstructed structure at this time because they were not built when the existing structures were built and people cannot walk or bike safely to the proposed stations.

Metro staff and project partners have discouraged meaningful conversations about the pros and cons of Alternative B1 and we believe that conversation needs to happen before the LPA is approved.

Crestwood's second preference is Alignment B2 without the Taylors Ferry refinement with additional pedestrian and bicycle station access safety improvements in Crossroads. Some of these projects include improvements to SW Barbur west of the Barbur Transit Center, SW

Capitol Highway north and south of the Transit Center, and SW Taylors Ferry Road between the Barbur Transit Center and SW 48th.

Alignment B2 without the Taylors Ferry refinement would “fly over” I-5 and SW Capitol Highway and continue along I-5 on the south side of Barbur. Alignment B2 without the Taylors Ferry refinement does less harm to neighborhood livability than the alignment with Refinement 2 because it has little impact on roadways within Crossroads.

TriMet’s Board of Directors adopted a Land Use Final Order (LUFO) Resolution 18-09-67 on September 26, 2018, that supports unrefined Alignment B2, as follows: “To the extent practicable, the light rail route, stations, park and ride lots, maintenance facility and highway improvements, including their locations, included in the application filed by, or on behalf of, the General Manager shall be consistent with those identified in the LUFO Steering Committee Recommendations. *Notwithstanding the forgoing, the application shall not include the first option identified by the LUFO Steering Committee for the Outer Southwest Portland Segment to travel on SW Taylor’s Ferry Road.*” (Italics added for emphasis)

Crestwood urges you to remove Refinement 2 from further consideration due to significant concerns about safety, motor vehicle traffic congestion, property impacts and natural resource impacts related to running light rail from Center Barbur to Taylors Ferry Road. Some of the reasons for this recommendation and desired outcomes are described below.

- Refinement 2 crosses both SW Barbur and SW Capitol Highway with a gated crossing at-grade. These at-grade gated crossings will increase motor vehicle traffic congestion at an intersection that is already severely congested. The DEIS proposes to mitigate motor vehicle congestion by adding more motor vehicle lanes on SW Taylors Ferry Road, not by adding better walking and bicycle facilities or better bus transit service.
- The light rail tracks will dislocate several residents and commercial businesses and insufficiently mitigate for negative impacts on alternative transportation and natural resources.
- West Portland is a town center that needs safer access to transit and other services. It has substandard or missing pedestrian and bicycle facilities on SW Barbur as well as SW Capitol Highway and SW Taylors Ferry Road that need to be improved as part of the SW Corridor project. The proposed construction of the light rail tracks on the north side of Taylors Ferry and proposed mitigation measures of adding motor vehicle lanes and noise/vibration walls will make it impossible to add sidewalks and bicycle lanes in the future.
- In particular, Portland TSP Project 90064.1 (SW Taylors Ferry Road Sidewalks and Bikeway) and Portland TSP project 90068 (West Portland Town Center Pedestrian Improvements) are needed to safely access transit from our neighborhood to the Barbur Transit Center.

- PBOT is finally implementing the SW Capitol Highway Project between Multnomah Village and West Portland but has temporarily suspended the design phase in the vicinity of SW Capitol Highway and SW Taylors Ferry Road because of uncertainty related to the SW Corridor alignment.
- Mixed Use Development in and near the Barbur Transit Center will better support light rail ridership than motor vehicle parking spaces. We recommend you reduce or eliminate the proposed number of vehicle parking spaces at Barbur Transit Center and consider affordable housing at the transit station location.
- The proposed construction of the light rail tracks on the north side of Taylors Ferry will have a negative impact on stormwater management at the headwaters of Woods Creek and Ash Creek and negatively impact the natural areas near Woods Creek and Woods Park.

We are also concerned that Refinement 4, Barbur Undercrossing, does not have much information in the SWC SC LPA, and request more information about this option before the LPA is adopted. Crestwood's July 25 testimony recommended amendments:

- The proposed "undercrossing" does not seem to be necessary and an at-grade Barbur/99W alignment needs to be studied to analyze costs and travel times between SW 53rd and SW 68th.
- The segment of SW Barbur from SW 53rd to SW 68th has many dangerous gaps in the pedestrian and bicycle network. The SWC LPA needs to include pedestrian and bicycle access to light rail stations at SW 53rd and SW 68th. In particular, TSP Project 90011 (SW Pomona/SW 61st sidewalk and bicycle improvements, SA-16), TSP Project 90048 (Markham Pedestrian/Bicycle overcrossing, SA-19 and SA-20), and Outer Barbur TSP Project 90017 are critical connections to these light rail stations.
- The DEIS Table 3.2-6 notes that the intersection of SW Barbur and SW 64th does not meet mobility targets yet the DEIS does not propose mitigation. The SWC SC LPA does not acknowledge noise and vibration impacts on low income residents living near light rail tracks near SW 64 and Barbur.

Preliminary Workplan Development (LPA Appendix A)

There are several items missing from the workplan, particularly regarding Segment B. The staff report for Resolution 1062, Exhibit C, provides more detail but we continue to have concerns.

- Community members such as Crestwood Neighborhood Association residents must be included in the discussions about park and rides, bicycle and pedestrian issues and traffic in our neighborhood. Metro and project partners have not said what the public involvement process will be in the next phase and we are requesting a citizens advisory group and frequent opportunities to discuss the project with members of the community.

- Bicycle and Pedestrian designs must consider how residents can safely access light rail stations over I-5 in the Crossroads, along SW Taylors Ferry Road, along SW Barbur between SW 53 and SW 68, and along SW Pomona/Pasadena/64th to Barbur to access the light rail stations.
- Park and Rides at Barbur Transit Center need to consider housing opportunities as a priority over motor vehicle parking spaces.

Traffic analyses must be broadened beyond what is proposed in Exhibit C and include:

- The effects of ODOT's proposed congestion pricing pilot project that is highly likely to generate more motor vehicle trips through Crossroads.
- The effects of additional motor vehicle travel through SW Portland to access park and rides located in Portland.
- The cumulative effects of traffic behavior at all intersections in Crossroads beyond those listed in Table 3.2-6, as noted in Exhibit C: SW Taylors Ferry Road and SW Capitol Highway, SW Taylors Ferry Road and the I-5 off ramp, the intersection of SW Capitol Highway/SW Brugger/SW 41st, SW Taylors Ferry and SW 41st, SW Taylors Ferry and SW Barbur, SW Capitol Highway and SW Barbur, SW Capitol Highway and SW Huber, SW Huber and the I-5 on ramp, etc.
- Strategies for mitigating existing congested intersections such the intersection of SW Capitol and SW Taylors Ferry Road which would be worsened with the proposed gated crossings.

Better bus transit service and connections to light rail stations are also critical so people can use transit directly from neighborhoods to light rail transit stations. Today, neither Bus #43 nor bus #44 directly transfer with other buses at the Barbur Transit Center and riders must walk ¼ mile to make the connections.

As stated earlier, Crestwood believes the SWC SC LPA lacks the vision to support projected growth in our region. Please support Alignment B1, Center Barbur or unrefined Alignment B2; reject Refinement 2 Taylors Ferry; amend Refinement 4 Barbur Undercrossing; and amend the preliminary workplan to design the SW Corridor project in a way that anticipates long-term growth in our region, encourages transit ridership, and protects the safety of everyone who lives in and travels through our neighborhoods.

We urge you to postpone consideration of the SWC SC LPA until these neighborhood concerns are further investigated and addressed.

Sincerely,

/s/

Tony Hansen, President

Crestwood Neighborhood Association

Portland City Council Item 1068

October 8, 2018

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Cc: City Auditor Mary Hull Caballero
Teresa Boyle, PBOT
John Gillam, PBOT
Eric Engstrom, BPS
Joan Frederiksen, BPS
Chris Ford, Metro
Eryn Kehe, Metro
Dave Unsworth, TriMet
Jennifer Koozer, TriMet

Attached: Crestwood Neighborhood Association DEIS Testimony dated July 25, 2018



CRESTWOOD

Neighborhood Association

July 25, 2018

Southwest Corridor Plan Steering Committee
Metro
600 NE Grand Avenue
Portland, OR 97232

Re: Southwest Corridor Plan DEIS

Dear Members of the Southwest Corridor Plan Steering Committee:

Crestwood Neighborhood Association is one of seventeen neighborhoods within Southwest Portland. We had been in favor of the SW Corridor Light Rail Transit Plan until the most recent Initial Route Proposal that destroys livability within our residential neighborhood and West Portland Town Center. Please consider these comments as you deliberate on the future alignment of the SW Corridor Plan.

Crestwood Neighborhood Association supports Alternative B1 (Center Barbur) and reconstruction of the intersection of SW Barbur and SW Capitol Highway.

To meet the stated goals of the DEIS in 1.3 “Need for the Project”, Metro and its partners must make the complex changes to the many intersections of Barbur Blvd, I-5, SW Capitol Highway, SW Taylors Ferry and SW Huber to make it safer for everyone—motor vehicles, pedestrians, bicyclists, transit and freight—that travel through the West Portland Crossroads Town Center. In 2010 residents renamed West Portland Town Center the “West Portland Crossroads” to reflect the dominance of transportation issues that inhibit the Town Center from realizing its potential. The Barbur Concept Plan vision for the Crossroads focus area is that the congested intersections of the Crossroads are redesigned to improve traffic flow, but also with improved pedestrian and bike safety. The Barbur Concept Plan is referenced heavily in the SWC DEIS Project Introduction and as a key document in the SWC DEIS Planning and Policy Framework.

The Barbur Concept Plan notes that there is no way to solve the transportation circulation in the Crossroads one intersection at a time. In 2015 ODOT’s Barbur Road Safety Audit recommended a long list of improvements needed at one of the least safe intersections in the City of Portland (Vision Zero). One of the long-term recommendations is the need for an intersection/interchange preliminary design study to identify future needs at this location and

identify property impacts. Instead ODOT decided to implement a near-term “jughandle” solution that reroutes traffic from Barbur onto local streets that will surely make conditions less safe at the SW Taylors Ferry and SW Capitol Highway intersection.

Because of all of these complex transportation issues within Crossroads, the DEIS motor vehicle traffic analyses in Chapter 3 must study all seven intersections in order to assess traffic impacts in the Crossroads and consider long term investments needed for the safety of all people traveling through this intersection.

The Crossroads intersection was constructed in 1959 and is not likely to survive an earthquake even of less magnitude than the predicted Cascadia earthquake. The Crossroads intersection does not have safe sidewalks and bike lanes that would allow people to walk and bike to the Barbur Transit Center and other services within the Town Center, and the Barbur Concept Plan recommended addressing the deficiencies that are preventing the Crossroads from achieving its potential as a Town Center. The Initial Route Proposal does not include improvements on SW Barbur or SW Capitol Highway within the Crossroads station area that would accomplish that long term goal.

Alignment B1 offers a full minute less travel time (Table 5.2-2), better supports the Barbur Concept Plan and redevelopment within the Crossroads, and would create a safe overcrossing for motor vehicles, light rail and people in the event of an earthquake and weather-related conditions. Please reconsider the Initial Route Proposal and adopt Alignment B1 as the Locally Preferred Alternative.

Crestwood does not support Refinement 2, Taylors Ferry Road due to the following concerns. If Refinement 2 is selected in Metro’s SWC Locally Preferred Alternative (LPA), Crestwood insists on having in-depth discussion of these concerns with our residents and businesses during the next phase of the project.

Traffic: Traffic congestion in our neighborhood in the vicinity of SW Taylors Ferry Road and SW Capitol Highway and at the I-5 ramps is really bad during commute hours and when Portland Community College’s Sylvania campus is in session, and it is unsafe to walk or bike through this area today. The proposed at-grade crossing through the SW Taylors Ferry and SW Capitol Highway intersection will make traffic and safety conditions worse. The traffic analysis in Chapter 3 studied only one intersection (Taylors Ferry at the I-5 off-ramp) and not all seven intersections as noted above. The Taylors Ferry Road Vision Plan adopted by Portland City Council in 2004 recommends removal of I-5 exit ramp and numerous changes to this area, as does the 2015 ODOT Barbur Road Safety Audit. The proposed mitigations—a traffic signal, a motor vehicle “storage lane” and a marked crosswalk—are not sufficient to alleviate our traffic congestion and safety concerns. The DEIS must also consider the current effort to implement Congestion Pricing on I-5 between SW Multnomah Blvd and downtown Portland and the additional motor vehicle traffic this will add to SW Taylors Ferry Road, SW Capitol Highway, SW Barbur Blvd. and other roadways in our neighborhood.

ODOT jughandle project: ODOT has funded but not provided detailed information to Crestwood on their proposal to eliminate the left turn from northbound SW Capitol Highway to I-5 southbound other than the 2015 Barbur Road Safety Audit description (Page E-6, key assumptions). Crestwood objects to this “jughandle” proposal because it will add more motor vehicle traffic to many neighborhood roadways at multiple intersections without adding needed safety improvements for all people traveling through the Crossroads. Crestwood recommends a much simpler solution to ODOT’s safety concerns at SW Barbur and SW Capitol Highway: add a left-turn signal where northbound SW Capitol Highway enters the I-5 southbound ramp.

Safe Walking and Biking Needs: There is a narrow path next to the eastbound travel lane on SW Taylors Ferry Road that was constructed as a bike path in the 1980s. This narrow path is constrained where it crosses Woods Creek and terrifying for pedestrians and bicyclists trying to access the transit service and facilities in West Portland Crossroads. SW Taylors Ferry Road needs to be transformed into safer access between our neighborhood and the Barbur Transit Center. Project SA16, Taylors Ferry Sidewalks and Bikeway, must be constructed concurrently with the light rail project to allow people to safely walk and bike through this intersection. Refinement 2 includes additional “storage lanes” and retaining walls and sound walls that will make it more complex and expensive to add pedestrian and bicycle facilities in the future. If Refinement 2 moves forward, Project SA16 must be included as part of the SW Corridor Project Plan and not an optional project that would be assumed to be constructed some time between now and 2035. If Refinement 2 moves forward, the light rail structure over I-5 must also include bicycle and pedestrian facilities that allow people to cross I-5 more safely than the current conditions on SW Capitol at Barbur.

Property Displacement Impacts: Crestwood is extremely concerned about the loss of residential housing in our neighborhood so close to the West Portland Town Center. Crestwood is also concerned about negative impacts to Barbur World Foods, a popular grocery destination for many residents and key to the town center’s success. The DEIS does not discuss how the alignment would affect access to Barbur World Foods and Walgreens. The DEIS Appendix F does not differentiate whether properties would be partially or fully impacted by the proposal and the Refinement maps don’t illustrate the detail of the proposal, making a lot of people very concerned about whether and how this refinement affects their home and livability in our neighborhood. A number of our residents are alarmed about the loss of property value and livability from a light rail alignment running through our neighborhood.

Noise and vibration, sunlight, trees and livability: Crestwood is concerned about the noise and vibration impacts described in the draft Initial Route Proposal. The proposed light rail structure might be located above existing homes. While sound walls might mitigate against noise and vibration impacts, Crestwood is very concerned about the massive visual impact of the light rail structure and walls, and loss of sunlight and trees in our neighborhood, and livability. The

proposed sound walls (and needed retaining walls as well as the train tracks and motor vehicle mitigations) may make it impossible to construct needed pedestrian and bicycle facilities on SW Taylors Ferry Road in the future.

Station Access Over I-5: Crestwood has advocated for over 20 years for a pedestrian/bicycle overpass over I-5 in the vicinity of Markham Elementary School to make the neighborhood more accessible to schools, shops and services as well as the proposed LRT stop at SW 53rd and Barbur. Projects SA19 and SA20 are essential Station Access Projects for our neighborhood. These are also Safe Routes to Schools and other services in our neighborhood. At a minimum, if Refinement 2 and/or Refinement 4 are pursued then each of the LRT I-5 overcrossings must include facilities for pedestrians and bicyclists.

Environmental Concerns: The proposed location of the Taylors Ferry alignment is at the headwaters of Woods Creek. Crestwood is concerned about existing stormwater issues within the nearby neighborhoods and water quality impacts that would be exacerbated by this proposal. Woods Creek and Woods Park are not discussed in Chapter 4 and only briefly mentioned in Refinement 2. The impacts on the Woods Creek watershed and Woods Memorial Park must be addressed in the SW Corridor Plan.

Park and Rides: The IRP proposes to add as many as 2200 parking spaces at the three park and rides in the vicinity of Crestwood (825 at Barbur Transit Center, 950 at SW 53rd and 425 at SW 68th). This additional motor vehicle traffic driving through our neighborhood to access the park and rides will compromise livability and safety in our neighborhood. Station Access Projects such as SA16 and SA22 need to be constructed at the same time as light rail construction to make it safer to travel through our neighborhood by foot, bike, car or transit. The motor vehicle analyses and mitigations in Chapter 3 only discuss intersections directly at the entrance to the park and rides and must address the safety on the roadways that access the park and rides.

Bus Transit Service: The DEIS does not discuss what would happen to bus #43 which travels along SW Taylors Ferry Road. Over the last 20 years TriMet has cut service to the #43 and eliminated direct service to the Barbur Transit Center which resulted in lower transit ridership and increased motor vehicle traffic accessing the park and ride. Crestwood recommends that the SW Corridor Plan enhance transit service along SW Taylors Ferry Road and directly connect #43 with the Barbur Transit Center station and add weekend transit service. This is especially important because TriMet's Service Enhancement Plan calls for bus #43 to cross the Sellwood Bridge to connect with the Orange Line rather than traveling to downtown Portland, making it essential that #43 riders directly connect with transit service to downtown Portland and Tigard at the Barbur Transit Center station.

Crestwood Supports Refinement 4, Barbur Undercrossing, with some concerns.

The proposed SW 68th station in Refinement 4 would improve access to SWC light rail for the western portion of Crestwood, as noted on page E-13, but the undercrossing makes no sense and the maps do not illustrate how this will work. As described above, Crestwood believes Alternative B1 (Center Barbur) provides a more direct route and faster travel times than Alternative B2. Alternative B1 should continue the alignment along Center Barbur from the vicinity of the Barbur Transit Center to the station at SW 68th and NOT tunnel under Barbur. Refinement 4 must also include bicycle and pedestrian facilities to infill the many gaps in the pedestrian and bicycle network on 99W to access the station near SW 68th.

The Barbur Undercrossing as proposed may negatively impact the low-income housing at Ash Creek Commons and other residents nearby through vibration and noise; Ash Creek Commons residents are already subject to toxic exhaust fumes from the I-5 off-ramp that would be worsened by added congestion on 99W. Table 3.2-5 indicates that the intersection of Barbur, SW 64th and the southbound I-5 off ramp does not meet mobility targets and mitigations must be included in the SWC plan.

In summary, Crestwood neighborhood Association supports the concept of Light Rail Transit on Barbur but does not support some of the cost-cutting refinements that lack long-term vision for our region.

The existing bridges at SW Barbur/SW Capitol Highway Crossroads and the Barbur I-5 Overcrossing between SW 60th and SW 64th were substandard when they were built in 1959 and 1985, respectively, lack safe pedestrian and bicycle facilities and are highly likely to be destroyed in an earthquake less severe than the predicted Cascadia earthquake. The Initial Route Proposal lacks the vision to support projected growth in our region by avoiding needed pedestrian and bicycle improvements to access transit. The proposed refinements 2 and 4, if they are selected for further study, must include pedestrian and bicycle facilities on the light rail structures to enable people to walk and bike safely to the light rail stations and other services in our neighborhood.

Please support Alternative B1, Center Barbur, reject Refinement 2 Taylors Ferry, and amend Refinement 4 Barbur Undercrossing to design the SW Corridor project in a way that anticipates long-term growth in our region and safety of everyone who travels through our neighborhoods.

Sincerely,

/s/

Tony Hansen, President

Crestwood Neighborhood Association

Cc: Marianne Fitzgerald, Vice President, Crestwood Neighborhood Association