



# CRESTWOOD

## *Neighborhood Association*

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November 15, 2018

Council President Tom Hughes  
Councilors Bob Stacey and Craig Dirksen, co-chairs, SWC Steering Committee  
Councilor Sam Chase  
Councilor Shirley Craddock  
Councilor Betty Dominguez  
Councilor Kathryn Harrington  
Metro  
600 NE Grand Avenue  
Portland, OR 97232

Re: Metro Council 11/15/2018 RES 18-4915, Southwest Corridor Light Rail LPA

Dear President Hughes and Councilors Stacey, Dirksen, Chase, Craddock, Dominguez and Harrington:

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 we reviewed the June 2018 Initial Route Proposal that negatively impacts livability within our residential neighborhood and access to West Portland Town Center. We continue to have concerns about the Locally Preferred Alternative (LPA) before you today.

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; and
- Amend Refinement 4 Barbur Undercrossing

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:



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- 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 68<sup>th</sup>.
- 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 48<sup>th</sup>.

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



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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. Crestwood will submit separate comments on Metro's LUFO Resolution 18-4938. We are pleased that TriMet's LUFO application does not include the Taylors Ferry refinement. We strongly disagree with the statement in TriMet's LUFO application (p. 4) that "roadway improvements on SW Taylors Ferry Road west of SW Capitol Highway no longer become necessary."

To reiterate previous comments on the LPA, 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.



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- 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 53<sup>rd</sup> and SW 68<sup>th</sup>.
- The segment of SW Barbur from SW 53<sup>rd</sup> to SW 68<sup>th</sup> 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 53<sup>rd</sup> and SW 68<sup>th</sup>. In particular, TSP Project 90011 (SW Pomona/SW 61<sup>st</sup> 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 64<sup>th</sup> 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.

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.

Sincerely,

/s/

Tony Hansen, President

Crestwood Neighborhood Association

Cc: Teresa Boyle, PBOT  
John Gillam, PBOT  
Eric Engstrom, BPS  
Joan Frederiksen, BPS  
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