



CRESTWOOD

Neighborhood Association

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 18-4938, Southwest Corridor Light Rail LUFO

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

Crestwood Neighborhood Association (CNA) is one of seventeen neighborhoods within Southwest Portland. 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.

We have submitted separate comments on the Locally Preferred Alternative (LPA), attached. These are additional comments on the Land Use Final Order that will be adopted through Resolution 18-4938. Crestwood's comments are directed toward specific criteria in the LUFO, and with only a week to review the LUFO these are the highlights of our concerns.

Criterion 2: Citizen Participation

Crestwood Neighborhood Association was one of approximately 2000 groups and individuals that tracked the Southwest Corridor project through the "interested persons" emails. Staff notified interested persons of upcoming steering committee and citizens advisory committee meetings and workshops, but staff did not notify interested persons of the August 13, 2018 meeting of Metro's LUFO Steering Committee. As noted in the resolution, public notice of today's Metro Council hearing was provided to this list on October 29, 2018 (4:54 pm) but LUFO materials were not made available to the public until November 8. That gave citizens seven days to review approximately 250 pages of materials.

Considering the legal implications of the LUFO, that timeline for public participation may have met the letter of the law but certainly not the spirit of the law, particularly for organizations like ours that must post notice to our members before commenting on these topics.



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Criterion 3: Neighborhood Impacts

Crestwood Neighborhood boundaries are incorrectly described in the LUFO page 120. Crestwood's legal boundaries are essentially SW Capitol Highway, SW Taylors Ferry Road, the western Portland City Limits and Interstate-5, and include the West Portland Town Center and Woods Park. The neighborhood is primarily single family residential but also includes the multifamily units at the southern end near SW Barbur (the Ashcreek Commons low-income multifamily residences are at SW 63rd and Palatine and five blocks from the proposed station at SW 68, and there are several other apartment units in that vicinity) and Crestwood has commercial businesses at both its northern and southern end.

The LUFO page 127 also incorrectly describes the "Far Southwest Landscape Unit" new bridge over I-5 as in Tigard at SW 60th, when it is within the City of Portland. Please note that the existing motor vehicle bridge over I-5 between SW 60 and SW 64th was constructed in 1985 without the pedestrian and bicycle improvements required by state law at the time, and any new light rail bridge over I-5 at SW 60th must include the required pedestrian and bicycle facilities to infill the gap. The LUFO page 155 must also note the need to provide access from the Crestwood neighborhood to the station at SW 68th.

The LPA seems overly reliant upon park-and-ride spaces in order to meet ridership goals. There are 1775 park and ride spaces proposed within the City of Portland adjacent to our neighborhood, which is over half of the proposed park and ride spaces in the SW Corridor LPA. This seems contrary to Portland's Comprehensive Plan **9.12.g. Locate major park-and-ride lots only where transit ridership is increased significantly, vehicle miles traveled are reduced, transit-supportive development is not hampered, bus service is not available or is inadequate, and the surrounding area is not negatively impacted.** The LUFO should support land use policies that encourage a hierarchy of transportation options and definitely should minimize the number of park and ride spaces within the West Portland Town Center.

The LUFO page 118 contains insufficient highway improvements to encourage non-vehicular access to the Barbur Transit Center station (Revised Figure 1.8) and meet the City of Portland goals of reducing vehicle miles traveled. We especially object to 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." Our neighborhood is one of the least walkable neighborhoods in the City of Portland and suffers from motor vehicle traffic congestion due to the presence of the I-5 off-ramp at SW Taylors Ferry Road and regional commuter traffic using SW Taylors Ferry Road between Washington County and Portland. The LUFO also does not anticipate needed pedestrian and bicycle improvements to access the proposed transit station at SW 68th. These and other station access projects must be included in the SW Corridor Plan and constructed in order to encourage people to access light rail by walking or biking without depending on a motor vehicle.

The LUFO page 128 makes unsubstantiated statements about quality of life and other conclusions related to our neighborhood, and we disagree with these conclusions. The station access projects not included in the



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LUFO are critical to the success of the project, and without them, residents will continue to drive to access light rail and other destinations. Some of the proposed mitigations are overhead structures and walls near residences that will give our neighborhood a walled-in feeling.

Criterion 4: Noise Impacts

The Barbur Concept Plan page 49 states that the community repeatedly expressed concern over the noise levels generated by I-5, Barbur and other transportation projects. The LUFO notes impacts to the residences on SW Palatine (p. 140) and SW 64th but not elsewhere. We believe noise will also affect residences further from SW 64th and Palatine and near the intersection of SW Taylors Ferry and SW Capitol Highway. Again, the mitigation will give our neighborhood a walled-in feeling and we hope the project partners can come up with better solutions to noise and vibration impacts for our neighborhood.

Criterion 5: Natural Hazards

The current overcrossing of I-5 at SW Barbur and SW Capitol Highway was constructed in 1959 and is not likely to survive a major earthquake. The LPA and LUFO does not define what constitutes a “major” seismic event. Crestwood Neighborhood Association prefers alignment B1 that would rebuild the overcrossing structure to incorporate modern seismic construction standards. The alternatives in the LPA must be designed to survive the earthquake that is likely to take down the current structure connecting the neighborhoods and key destinations north and south of Crossroads and allow emergency vehicle access to the schools and residences on the other side of the freeway from Portland Fire Station 18.

Criterion 6: Natural Resource Impacts

The LPA and LUFO will impact the natural resources within Crestwood, especially Woods Park and properties zoned as environmental zones. The LPA and LUFO do not specify which alignment will be selected for the Crossroads segment of the plan. Some of the alignments under consideration for Crossroads will negatively impact the park and environmentally sensitive properties in our neighborhood.

Criterion 7: Stormwater Runoff Impacts

The City of Portland’s stormwater policies do not function well in neighborhoods such as ours that have poorly infiltrated soils. Contrary to the LUFO findings (page 149), most of SW Portland is subject to the “MS4” permit that discharges stormwater directly to streams, not to combined sewers. The SW Capitol Highway project (Multnomah to West Portland) 60% design includes regional stormwater facilities. We are concerned that the LPA and LUFO do not account for the additional stormwater facilities that will be needed to properly manage and treat stormwater in our neighborhood.



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Criterion 9: Air Quality and Energy Impacts

The LPA and LUFO discuss criteria pollutant and greenhouse gas emissions but makes no mention of the toxic emissions from the construction equipment and additional motor vehicles traveling through our neighborhood. As a minimum, the LUFO must comply with City of Portland and Multnomah County policies that restrict idling of construction vehicles and encourage clean diesel fuels.

Criterion 10: Portland Alignment

The LUFO states that the light rail route stays along SW Barbur for its entire length through SW Portland to I-5 and the Tigard City Limits. We wish that were true, per our attached comments on the LPA and desire to pursue Alternative B1 that is most supportive of the Barbur Concept Plan. Again, the LUFO fails to meet the intent of the Barbur Concept Plan (BCP). As noted on page 44 of the BCP, “potential growth at the Crossroads has been arrested in large part by the traffic congestion. The community, while generally supportive of more intense land use in this designated town center, has been reticent to support much development in an area where the street network is at or near capacity and the bike and pedestrian connections are lacking from the surrounding neighborhoods.”

Thank you for the opportunity to provide comments on Metro Resolution regarding the Southwest Corridor LUFO. Please let us know if you have questions.

Sincerely,

/s/

Tony Hansen, President

Crestwood Neighborhood Association

Attach:Crestwood NA comments on the LPA Resolution 18-4915 dated 11/15/2018

Cc: Marianne Fitzgerald, Vice President, Crestwood Neighborhood Association
Teresa Boyle, PBOT
John Gillam, PBOT
Eric Engstrom, BPS
Joan Frederiksen, BPS
Chris Ford, Metro
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