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July 29, 2005

John VanLandingham, Chair
Land Conservation and Development Commission
635 Capitol Street, NE
Suite 150
Salem, Oregon 97301-2540

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ODOT
HEADQUARTERS

cc: Craig Greenlee

Subject: Oregon Transportation Planning Rule (OAR 660-012-0060): Recent and Proposed Revisions

Dear Chair VanLandingham:

Thank you for this opportunity to comment on both recent and proposed changes to the Oregon Transportation Planning Rule (TPR). As we all recognize the TPR has been a foundation for coordinating community planning with the development of an efficient transportation infrastructure. It is a basis for this region's significant investment in transit and high capacity light rail transit in particular. Oregon has earned an international reputation as a leader in the smart application of such transportation and community planning policies. These policies have furthered community-supported efforts among state and local agencies to develop and protect a much-cherished quality of life in our state.

Comments from TriMet fall into two categories and reflect the organization of recent discussions in the Portland metropolitan area in both the transportation and land use coordination arenas as led by Metro. Interchange Management Strategy comments pertain to revisions adopted by the LCDC on March 15, 2005. Comments regarding the Purpose Statement relate to proposed revisions that emerged from more recent Work Group discussions. I understand those discussions are responding to stakeholder interviews conducted last year.

Interchange Management Strategy:

1. This region's 2040 Framework Plan, as supported by the Regional Transportation Plan (RTP), calls for a hierarchy of transportation facilities that support designated land use types, with a focus on Regional and Town Centers and station communities. These centers naturally fall near major road facilities and likewise need to be interconnected by high-capacity transit. Many light rail station areas thus fall within a half-mile of highway interchanges. It is important that we bring together land development opportunities and major public transit investments to enhance mobility and community livability – consistent with state, regional and local plans.

2. This region's light rail system is developing incrementally with some station areas already zoned by local jurisdictions to reflect the unique development opportunities around light rail stations. Planning studies are still being conducted for many station areas and new station areas are being defined in conjunction with anticipated light rail system extensions. Station areas play a strategic role in this region's development strategy. These areas need to be developed against objective criteria that address the concerns of respective agencies including TriMet, ODOT and local jurisdictions and in concert with regional plans and policies. Mixed-use communities at light rail stations provide unique opportunities for increasing life-style choices, for enhancing livability and for reducing automobile dependency.
3. Freeway interchanges are natural crossroads that provide needed community access. Trips accessing the freeway systems will generally originate well beyond a half-mile. Pushing smart growth from areas best supported with highway and transit access does not solve an interchange congestion problem, but pushes development to places that are hard to efficiently serve with alternative modes of travel. Smart growth near interchanges can actually replace auto-oriented land uses with those that can reduce auto-oriented trip making.
4. Station area and regional center planning needs to be conducted with a level of detail that would not be supported by the proposed TPR impact criteria. The mix and density of development, topographical features, community context and the placement of institutions require a detailed level of planning that needs to be integrated in Interchange Area Management Plans (IAMPs). Local agencies and ODOT need to work closely and consistently on such plans to reduce automobile dependency and the impact of local traffic on state highways.
5. TriMet recognizes how the balanced development of modes contributes to the creation of an efficient transportation system. With transit, we hope to reduce single occupant auto trips; with pedestrian-oriented communities more trips can be made on foot or bicycle. In addition, park-and-ride lots can shorten auto trips that are taken.
6. Attached is a list of high capacity transit station areas that are likely to be affected by the proposed interchange area oversight anticipated by the TPR.

The Transportation Planning Rule Purpose Statement

1. The TPR Purpose Statement dilutes the historic intent of the TPR (in a previous life – Director of DEQ – I helped craft this language) – to enhance livability by reducing reliance on the automobile. The proposed revision replaces the “reduced reliance” phrase with more passive language encouraging the availability of transportation choices to achieve some unspecified balance of vehicular use. If there is concern about the current language being explicitly anti-auto one could say “greater reliance on other modes.....”
2. Breaking the purpose statement into nine elements is potentially confusing. The separation of purposes dilutes the livability aspirations that have been historically upheld by the TPR. These considerations are closely related and must be taken

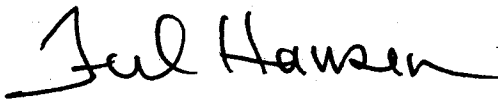
together – not an implied choice of one or the other. The original language provides that integration.

3. The TPR is less a tool for putting trips on transit, as it is a tool for planning and designing livable communities. Residents of communities lacking transit services still benefit when residents are able to walk to a corner store instead of driving a car as the only means to exit a walled neighborhood with poor street connectivity.
4. The existing opening statement is clear in setting policy that promotes livable communities that provide more modal choices and therefore less auto dependent.
5. We often find that a single purpose statewide policy cannot meet the needs of all communities, one size not filling all. The Portland Region's challenges may not be the same as those of more rural communities. One option to address these differences is to make a distinction in terms of what applies to major metropolitan areas and what applies to rural areas.

Lastly, I would ask that as you proceed to evaluate stakeholder perspectives on any such revisions, you include TriMet as a stakeholder.

Thank you for the opportunity to comment on this important effort.

Sincerely,

A handwritten signature in black ink that reads "Fred Hansen". The signature is written in a cursive, slightly slanted style.

Fred Hansen
General Manager

C: Rex Burkholder, Metro Council
Stuart Foster, Oregon Transportation Commission

**Possible Impacts from Recent TPR Revision
to TriMet Efforts within High-Capacity Transit Station Areas**

Agency Contacts:

Phil Selinger, Jillian Detweiler, David Zagel

MAX Blue Line (Eastside/Banfield and Westside)

Station Areas:

- Lloyd Center/NE 11th Ave and Hollywood TC/NE 42nd Ave: zoning for these two station areas is generally intense and transit supportive, but modifications to zoning may still be needed in the future.
- NE 60th Ave and NE 82nd Ave: The City of Portland is seeking Transportation Growth Management (TGM) funds to study eastside station areas; for these two specific areas, the primary goal is the improvement the pedestrian environment for neighborhood access to the light rail stations.
- Gateway TC/NE 99th Ave: TriMet and the PDC are partnering to create redevelopment momentum in the Gateway area. As this effort progresses and more real projects are proposed, zoning refinements may be desirable.
- NE 102nd Ave: the Gateway Urban Renewal area includes this station area and it has already been zoned for higher density development; however, additional re-zoning may be desirable for specific project sites.

MAX Red Line (Airport)

Station Areas:

- Parkrose/Sumner TC: The City of Portland is seeking TGM funds to study this eastside station area (among others).

MAX Yellow Line (Interstate)

Each new MAX Yellow Line station area is within ½-mile of an Interstate highway interchange.

Station Areas:

- Interstate/Rose Quarter
- Albina/Mississippi
- Overlook Park
- N Prescott St
- N Killingsworth St
- N Portland Blvd
- N Lombard TC
- Kenton/N Denver Ave
- Delta Park/Vanport
- Expo Center

The City of Portland's Comprehensive Plan calls for more intensive zoning around these stations, but legislative action by the City is required to enact these designations corridor-wide. As a result, individual property owners have been seeking zone changes through a quasi-judicial process in order to permit higher density and transit-oriented development.

These development projects are expected to reduce the share of trips made by car by increasing the availability of goods and services in the neighborhood, but may increase the total number of trips by increasing (somewhat) the overall population and activity in the corridor. TriMet notes, however, that the population of North and Northeast Portland is still below historic highs.

MAX Green Line (I-205)

As the alignment parallels I-205, all proposed station areas may be considered for rezoning. Two stations seem particularly in need of better transit orientation--Fuller Road in Clackamas County and Powell in Portland.

MAX Green Line station areas of particular interest:

- The Market/Main station area is within the Gateway Urban Renewal area and it has already been zoned for higher density development; however, additional re-zoning may be desirable for specific project sites.
- The Powell Blvd station is dominated by auto-oriented uses, consistent with the existing zoning. A rezoning plan leading to the evolution away from an exclusively auto-oriented environment is needed to make it safe and convenient for existing residents to access transit.
- The Fuller Road station area is currently zoned for low traffic commercial, but the development on the ground is primarily (nonconforming) residential and is surrounded by big box retail. The station area is being considered as a site for a North County Clackamas Community College campus, which would probably have a medical training focus. Both transit and freeway access would be highly desirable for this facility but, obviously, if the campus is not located on transit, all trips to it will be made by car. New zoning would be required to permit a campus at the Fuller Road station area.

Other High-Capacity Transit Corridors (including Barbur Blvd.)

Other corridors slated for high-capacity transit service would likely be impacted by the ½-mile interchange rule. The Barbur corridor, for example, would have multiple high-capacity transit station areas within ½ mile of Interstate 5.

Wilsonville-Beaverton Commuter Rail

Of the five planned commuter rail station areas, two, Wilsonville and Tualatin, would be affected by the ½-mile Interstate highway interchange rule.