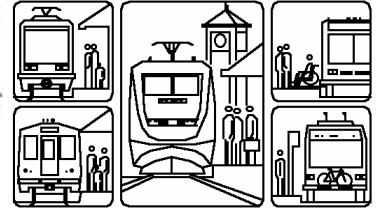


Association of Oregon Rail and Transit Advocates

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March 8, 2006

Federal Transit Administration Region 10
Richard F. Krochalis, Regional Administrator
Jackson Federal Building
915 Second Avenue, Suite 3142
Seattle, WA 98174-1002

Dear Mr. Krochalis,

The Association of Oregon Rail and Transit Advocates (AORTA) is a statewide open membership organization that educates and advocates for environmentally sound transit and transportation policies.

AORTA supports final funding of design and construction of the I-205 portion of the Portland, Oregon South Corridor Light Rail Project. However, we respectfully request that FTA withhold agreement for final funding of design and construction of the Transit Mall portion of this project, for reasons explained below. We ask that you appoint an independent reviewer to assess the significant Downtown alignment capacity constraints before any further action is taken on this segment.

The FTA should not fund projects or allow them to proceed when they have fatal design flaws that negate their effectiveness or otherwise produce significant, avoidable negative impacts on mass transit systems in the region being funded.

The flaw is a design that fundamentally limits the capacity of the existing TriMet light rail line to Washington County (Westside MAX) to an inadequate level. This operational issue is nowhere addressed in the FEIS.

AORTA has publicly testified over the course of the development of the South Corridor Project, including testimony as recent as February 23, 2006, to the Project Steering Committee, directly addressing the fatal flaw described below.

Currently, between 4:30 pm and 5:30 pm, there are 17 Eastbound and 16 Westbound trains passing through the Rose Quarter Interlocking, where the Yellow (Interstate) line joins the main Red and Blue lines. The Westbound trains consists of 8 Blue line trains, 4 Red line trains, and 4 Yellow line trains. The 8 Blue and 4 Red (total of 12) continue through downtown Portland to serve Washington County. (See Attachment A). The 12 trains are required to handle the afternoon Westside peak loads of over 2,200 passengers during this time period (TriMet's Fall 2005 APC data) . Five of those trains already carry loads at least 90% of two car capacity of 266.

According to Chapter 2 of the South Corridor FEIS, in the year 2025, with the Green Line and Mall alignment operational, 12 Blue, 4 Red, 6 Yellow, and 8 Green trains are proposed to operate in the peak hour. (See Attachment B). Therefore 30 trains will be operating westbound across the Steel Bridge in the pm peak hour, the maximum that this bridge can handle. Since 6 Yellow and 8 Green trains will be destined to the Mall alignment, the bridge will be able to accommodate at most 16 trains in the afternoon peak hour to carry passengers from downtown Portland towards Washington County. The 16 trains represent an increase of 33% over today's level of service, or an annual compounded increase of 1.5% per year for 19 years.

However, over the past six years, ridership on the Red and Blue lines to Washington County has grown at an average compounded rate of 5.5% annually. Given the planned opening of the Washington County

Commuter Rail project, it would be very conservative to project a 3% annual growth rate. This would require 20 - 21 trains per hour departing for Washington County in the pm peak in the year 2025 (See Appendix C). Thus the plan's projection of 16 trains reflects a deficit of 4 to 5 trains, and it will be even larger if growth occurs at historic rates.

The practical answer to the demand for additional capacity to Washington County is to extend Green Line trains to Washington County in addition to the Blue and Red lines. This provides a consistent high frequency service between Gateway and the Beaverton Transit Center, which is the north terminus of the Washington County Commuter Rail Line.

All trains serving Washington County must cross the Steel Bridge and pass through the Rose Quarter interlocking, because there is neither a turnaround nor any useable storage tracks on the west side of the river. Consequently, the Steel Bridge and the interlocking will effectively limit all further growth in service to Washington County. All service diverted from the Cross-Mall alignment to the Mall will be at the expense of service to Washington County. Today, the Rose Quarter interlocking is at its effective free-flow capacity. By building delays into the schedules to produce queuing at that junction, which will increase travel times, the capacity of the current configuration may be pushed somewhat higher. However, the 30 trains per hour envisioned for the year 2025 may come at the expense of significant delays, and are likely the practical limit.

This raises the obvious question: Why is including light rail in the Mall Revitalization project needed in order to proceed with the South Corridor Light Rail line to Clackamas County? In the *Downtown Light Rail Systems Analysis* (Dec. 2002) it states in paragraph 2.7.3 (page 41) that 30 trains an hour can proceed through the Cross-Mall with the current 60 second signal cycle and up to 33 trains an hour could proceed if the signal cycle were changed to 54 seconds. However, the Steel Bridge, not the Cross-Mall alignment limits capacity to 30 trains an hour.

There must be an independent analysis of the capacity issues that we raise, prior to authorizing any further expenditure on Final Design of the Mall. It does not make sense to be spending money at cross purposes, and possibly reducing regional rail capacity below current levels, when we should be looking at adequate capacity, including a margin for growth, for the next 20 years.

Please appoint an independent reviewer to assess the capacity constraints that are apparently being built into this project, and do not allow the Mall portion of the project to proceed further until these constraints have been adequately addressed.

Sincerely,

| Robert [E. Krebs](#)
President

cc: Sen. Ron Wyden
Sen. Gordon Smith
Rep. Earl Blumenauer
Rep. David Wu
JPACT
Portland City Council

TriMet Gen. Mgr. Fred Hansen
METRO Council
TriMet Board of Directors
Washington County Commission
The Oregonian
Portland Tribune