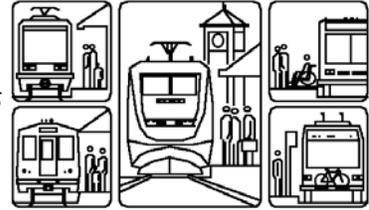


Association of Oregon Rail and Transit Advocates

AORTA • P. O. Box 2772 • Portland, Oregon 97208-2772

Also known as OreARP • Oregon Association of Railway Passengers

Phone & Fax: 503-241-7185 • OregonRail@netscape.com • www.aortarail.org



April 20, 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:

We are disappointed that your letter of March 25 finds no "compelling justification" in our recent letters to warrant revisiting the planning decisions regarding the Transit Mall portion of the South Corridor project. Given your recent remarks made at a Clark County, Washington meeting (reported by the Oregonian March 20, 2006), we had expected your agency to play more of a "Gatekeeper" role in reviewing projects. We understood you to say that with less money available, federal scrutiny is getting tougher and all options should be explored.

We have been trying to make clear that full examination of alternatives and long-term thinking have not gone into the Transit Mall project. TriMet and local decisionmakers have put political considerations ahead of sound transit planning principles, which will either severely limit the effectiveness of Tri-Met's transit system or require costly fixes early on in the next 20 years.

In fact, as a result of our letter exchanges, we are now convinced that TriMet and local decisionmakers deliberately limited consideration of alternatives to light rail on the Mall, primarily for political reasons. Specifically, both TriMet's letter of 3/20/06 and the FEIS misrepresent the findings of TriMet's own December 2002 *Downtown Portland Light Rail Systems Analysis (DPLRSA)*, which determined the Cross-Mall alignment could accommodate both the addition of South Corridor service and realistic growth of Westside corridor service.

TriMet has never made that downtown analysis available to the general public. We obtained a copy from the Portland Tribune, who asked our opinion of the document. Had we known of its contents at the times when we provided earlier testimony regarding the project, we would have raised this serious problem then.

The Portland Metro Chapter of AORTA has prepared a list of concerns about this project which are attached.

In light of these objections, we urge you to use your oversight powers to grant our original March 8, 2008 request that:

- FTA withhold agreement for final funding of design and construction of the Transit Mall portion of this project and
- You appoint an independent reviewer to assess the significant Downtown alignment capacity constraints before any further action is taken on this segment.

Sincerely,

Handwritten signature of Robert E. Krebs

Robert E. Krebs, President

cc: Norman Mineta, Secretary of Transportation
Sandy Bushue, FTA Acting Administrator

Attachment: Findings of the AORTA Portland Metro Chapter

**Findings of the AORTA Portland Metro Chapter
Regarding the Portland Mall of the South Corridor Light Rail Project**

Given the data recently made available, it is clear that the Portland Mall segment of the South Corridor Project fails to meet FTA New Starts Criteria on the following grounds:

1. **Lack of demonstrated need.** There is no capacity benefit to building the Mall project. The alleged lack of capacity on Yamhill/Morrison is the sole reason that the cross-mall option was eliminated from further consideration. The cross-Mall option was the defined downtown routing for the South Corridor prior to the *DPLRSA*.
2. **Deliberate misrepresentation of material facts.** There is evidence that the *DPLRSA* was intended to discredit the cross-mall option, but when the purposely limited technical analysis failed to do this, TriMet opted to misrepresent the results of that analysis.
3. **No ridership increase.** Modeling for the Main St. Turnaround Option showed that total transit system ridership is not increased by the Mall project.
4. **Increased operating cost.** Estimates for the Main St. Turnaround Option showed that operating costs would be significantly increased by the full Mall project.
5. **Detriment to transit system capacity.** Simple arithmetic shows that with the Steel Bridge limited to 30 trains per hour, each and every train diverted to the Mall subtracts from potential capacity to Washington County. TriMet's Washington County peak ridership growth rate, assumed in the South Corridor project modeling, is significantly lower than the "fiscally constrained" growth rate in the 2004 Federally Approved Regional Transportation Plan. This discrepancy is clear evidence that the modeling of Washington County ridership growth, and therefore the need for future peak hour capacity, is fundamentally flawed.

A companion Supporting Technical Data document, providing more detailed information backing our above claims, is available upon request.

Submitted by Jim Howell, Chapter Chair 4/17/06