



East Portland Action Plan

October 19, 2016

Powell-Division Transit and Development Steering Committee

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RE: Concerns about the plans for a High Capacity Transit (HCT) System along Division St. from the Willamette River to the Gresham Transit Center

Argay
Neighborhood Association

Centennial
Community Association

Glenfair
Neighborhood Association

Hazelwood
Neighborhood Association

Lents
Neighborhood Association

Mill Park
Neighborhood Association

Parkrose
Neighborhood Association

Parkrose Heights
Association of Neighbors

Pleasant Valley
Neighborhood Association

Powellhurst-Gilbert
Neighborhood Association

Russell
Neighborhood Association

Wilkes
Community Group

Woodland Park
Neighborhood Association

Dear Powell-Division Transit and Development Steering Committee Members:

The East Portland Land Use and Transportation Committee (EPLUTC) represents the neighborhoods of East Portland which are comprised of the 150,000 residents of East Portland and 25% of the city's area. East Portland is 20% of the land mass of the City of Portland; has 29% of the City's population and 40% of the City's students; has significant racial/ethnic/language diversity (schools with over 50% native language other than English); and, has high rates of poverty (schools with 100% free or reduced lunch). When compared to the City of Portland, East Portland's demographic diversity surpasses the city's overall demographic averages for African American (double), Asian (double), Hispanic (1.5 times), and "other" races (1.5 times). The East Portland Action Plan (Action Plan) was adopted by the City of Portland (2009) and Multnomah County (2010) to provide leadership and guidance to public agencies and other entities on how to strategically address community-identified issues and allocate resources to improve livability for neighborhoods and prevent displacement in the East Portland Neighborhood Office (EPNO) coalition area.

As the committee moves into the final stages of planning for the Division Bus Rapid Transit and Development Project, it is obvious that some of the concerns that the EPLUTC and EPAP have mentioned previously are not being addressed and have not even been brought up for discussion. Further, the project does not seem to provide any significant benefits to East Portland, and will result in a loss of access to transit due to proposed stop reductions. For the reasons stated below, EPLUTC and EPAP do not support the project as currently proposed:

- There has been no commitment to establish a Community Advisory Committee that will have an active role in option development and veto power;
- The Powell-Division Portland Local Action Plan does not provide for any significant additional funds to address displacement prevention should the BRT bring the significant changes projected to make it worthwhile. Funds identified in the current Action Plan, as Comm. Fish said: “Takes old wine and puts it into a new bottle.”
- The implementation of a plan and policies addressing commercial and residential displacement prevention and remediation resources using “East Portland Action Plan Involuntary Displacement Prevention Recommendations <http://tinyurl.com/EPAP-displacement-Recommendations> should be instituted. There needs to be an adequate appraisal of platform locations along SE Division since platforms will need approximately 80 feet of sidewalk to install. Given the large number of driveways, especially near intersections, these platforms could have significant impacts on local businesses’ access to Division St.
- TriMet has consistently failed to adequately assess the impact on people with mobility barriers, and has only used wheelchair ramp deployments to determine impacts at stops being proposed for elimination.
- Elimination of Mt. Hood Community College from the alignment is of great concern in that MHCC serves almost all of East Portland
- There is insufficient time before the Committee vote to obtain an enforceable agreement from the TriMet Board to upgrade the line #20 bus (TriMet’s answer to concerns about dropping MHCC from the alignment) to frequent service before the LPA is decided.
- Use of Systems Development Charge (SDC) funds can be applied to provide for ADA curb access (a federal requirement) and protected bike lanes on Division as a match for any related capital project (e.g. 100’s, 150s or 130s bikeway crossing improvements) regardless of whether a HCT project is developed on Division. Withholding these funds should not occur if the project does not proceed.
- TriMet should not use service hours from the #4 to expand service on other routes in East Portland,
- Neither TriMet nor Metro has demonstrated any plan to address congestion on inner or outer Division. Congestion along the alignment is the cause of a lack of reliability for the current #4, and issues such as bus bunching will continue until congestion issues are addressed.
- The project does include new crosswalks along Division. However, these should be provided on Division regardless of whether there is a HCT project. Division is one of the highest crash corridors in the state.
- Sidewalk infill that has been slated for outer Division is responsibly proceeding without this project, in accordance with the need of this high crash corridor.
- No new sidewalk access will be provided due to this project. Any “new” sidewalks will only be at platform locations to provide access from the lower sidewalk to the platform, which will not be needed without this project.
- The TriMet report dated 1/22/15 shows that 75% of East Portlanders ride less than 4 miles on average. TriMet analysis of rider patterns shows that most riders in East Portland do not travel to downtown Portland. EPAP Economic Development Analysis shows that East Portland residents, while graduating high school at higher rates than citywide, do not that the 4-year degrees that working in downtown Portland requires.

Given the reasons stated above, EPLUTC and EPAP urge the Steering Committee to reject the Division HCT project as proposed. Further, we encourage TriMet to work with East Portland residents to develop solutions that will improve service for the riders of the #4 Division bus (such as the previous use of combined local and express service buses).

We look forward to being a constructive partner in this process.

EAST PORTLAND ACTION PLAN

www.eastportlandactionplan.org

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