October 31, 2012

Via email: info@OregonPassengerRail.org

Michael Holthoff  
ODOT Environmental Project Manager  
ODOT Major Projects Branch  
3210 Del Webb Ave NE, Suite 110  
Salem, OR 97301

Re: Agency Comment for Oregon Passenger Rail Study- Scoping Phase

Dear Michael,

The Department of Land Conservation and Development is pleased to comment on the scoping phase of the Oregon Passenger Rail Study. The agency is supportive of planning efforts to provide Oregonians with additional travel choices that promote land use patterns that protect agricultural land and encourage vibrant, sustainable, and strong communities.

The purpose of this letter is to respond to the request for agency comment in the scoping phase of the study. Our comments are organized into the following sections:

1. Agency Contacts  
2. Agency’s Primary Interest  
3. Agency Engagement  
4. Comments on the Draft Purpose and Need Statement  
5. Comments on Rail Route Alternatives  
6. Comments on Study Methods and Evaluation Criteria  
7. Additional Comments and Suggestion

1. Agency Contacts

The agency has assembled an ad hoc internal team of staff members to respond to this project. The coordinator and first point of contact is Bill Holmstrom. The ad hoc internal team also includes several other staff members who have expressed interest in the project. The entire team will be involved in the agency’s coordinated response to the project.

The study area encompasses the areas of responsibility for four Regional Representatives: Ed Moore in the southern Willamette Valley, Angela Lazarean in the Mid-Willamette Valley, and Anne Debbaut and Jennifer Donnelly in the greater Portland Metropolitan Area. Our Regional Representatives will be able to assist local governments with local concerns.
2. **Agency’s Primary Interest**

DLCD’s mission is: “to help communities and citizens plan for, protect and improve the built and natural systems that provide a high quality of life. In partnership with citizens and local governments, we foster sustainable and vibrant communities and protect our natural resources legacy.”

We have two key roles in this project:

- We support improved passenger rail because it has the potential to transform the Willamette Valley and help achieve our mission. We want to see compact, vibrant communities surrounded by agricultural and natural lands and support the project as a way to promote desired land use patterns. We want to contribute our expertise toward meeting these goals.

- As a regulatory agency tasked with the management, in concert with citizens and our local government partners, of Oregon’s land use planning system, we must ensure that this project progresses in a manner consistent with the Statewide Planning Goals, as well as meets all applicable statues and rules.

Our primary interest is in land use interactions. These include impacts directly along the corridor, on a scale up to the entire Willamette Valley and the rest of the state. We want to know what this means for surrounding land uses. Station areas are of particular, but not exclusive, interest.

The decisions made in this project need to address the larger public interest as part of a plan for the Willamette Valley. We are concerned that the NEPA environmental review process has sometimes resulted in narrow decisions about projects because of how the environmental process was framed. This process should explore a range of ideas and solutions that meets the needs of the people of Oregon for many years into the future.
Selection of a corridor for passenger rail should be in the context of a long range vision for serving intercity passenger travel in the Willamette Valley. The decision to select a corridor for higher speed passenger service should be made not in isolation, but in the context of the longer term vision. Consistency with the long term vision should be a key criterion for selecting a corridor. The vision should consider how higher speed passenger rail relates to other elements of the long term vision, particularly commuter rail or other rail services that might also be accommodated in the selected corridor, intercity bus transit, and intermodal connections.

3. **Agency Engagement**

We intend to actively engage with the project at all levels and encourage our partners in affected local governments to actively engage with the project.

- Marilyn Worrix was appointed by the governor to the Leadership Council to represent the Land Conservation & Development Commission. Her term on LCDC is coming to an end, and we anticipate that the governor will appoint a replacement by the end of this year.
- Director Jim Rue or Deputy Director Carrie MacLaren will represent the department at meetings of the Corridor Forum.
- Our regional representatives will represent the agency at meetings of the Community Advisory Groups.
- We have assembled an internal *ad hoc* group of staff to review & respond at an agency level as the project progresses.
- We will encourage local governments and citizens to be engaged in this project.

4. **Comments on the Draft Purpose and Need Statement**

a. The purpose statement should support development of desired land use patterns in affected communities.

b. The purpose statement should be clear about the intent to provide a service that will meet the travel needs of a substantial share of the demand between affected markets. The purpose statement states that the project will provide a convenient, rapid, reliable, efficient, safe, and cost-effective alternative. In addition to frequency, these are necessary ingredients, but a list of desirable attributes is not sufficient for the purpose statement.

c. The purpose statement does not identify the intended travel markets, only the endpoints of the project at Eugene-Springfield and the Columbia River. The purpose statement does refer to the Pacific Northwest Rail Corridor including Washington State and British Columbia. However the purpose statement should be clear about the travel markets the project is intended to serve within Oregon. For example, no mention is made of Salem in the purpose statement, and even the Portland metro area is mentioned only in reference to the northern boundary of the project at the state border.
d. The need statement should include a reference to the development of desired land use patterns. For example, in order to encourage dense development patterns in cities, it is necessary to develop a range of transportation options, including intercity/regional passenger rail.

e. The need statement should address the state’s energy efficiency and greenhouse gas reduction targets.

5. Comments on Rail Route Alternatives

Our comments address not only geographic route alternatives, but other elements that should be studied as well.

a. Initially, a wide range of route alternatives should be identified, including possible combinations and permutations of alternatives. E.g., alternatives using the Union Pacific alignment for some segments and Oregon Electric alignment for other segments.

b. Alternatives including motor coaches or other non-rail passenger transport should be included in the study, especially as interim options that help build a market for intercity travel before rail improvements can be constructed.

c. Alternatives should include potential methods to phase work over time. Alternatives should include work that can be accomplished in the short term as well as meet long term objectives.

d. Alternatives should not only address the route, station locations, and technologies; but operational issues as well, including frequency, speed, capacity, operations, and maintenance.

e. Alternatives should be clear about the expected impacts on surrounding land uses, particularly at proposed station locations, but also along the lines.

f. Each alternative should include an estimate of the level of service expected in the future, including services per day, and ridership including the number of boardings and alightings at each station.

g. Consider alternatives that operate as a network rather than merely a single line. Consider branching alternatives; alternatives with local, limited, and express services; hybrid services; and alternatives including services that extend over segments as well as the entire corridor.

h. Consider alternatives with greenfield segments. No goal exceptions are required for railroad improvements. Consider new tunnels or elevated structures if the additional investment could make a positive contribution toward meeting the project’s goals.

i. Many alternatives will include a high level of investment in transportation infrastructure. To the extent possible, determine how the high level of investment can be leveraged through additional use of the infrastructure by local passenger rail services, commuter rail, or freight rail.
j. Rail alternatives should include a variety of technologies and operating schemes, including concepts that have been successfully used overseas in similar contexts, even if there are have regulatory hurdles in the United States. These concepts could include rolling stock, platforms, signaling, and operating practices that would not otherwise be permitted. The Federal Rail Administration (FRA) may grant waivers of some regulations, and has done so in some circumstances. The existence of these regulations should not prevent the inclusion of alternatives that would require waivers.

k. Consider the potential for local stations, or commuter rail stations, in addition to the existing intercity stations.

l. Develop alternatives by working backwards from targets for passenger mode share, and targets for travel time. Include potential door-to-door travel times as well as station-to-station travel times.

m. Identify potential travel markets aside from city centers, e.g., universities or Portland International Airport.

n. Consider alternatives that incorporate bicycle and pedestrian facilities in combination with an alignment.

6. Comments on Study Methods and Evaluation Criteria

Methodology:

a. Potential station locations should be studied at a level of detail that allows communities to understand impacts on neighboring areas. Parcel-level detail is not necessary, but community-level detail is too coarse.

b. The project should consider existing, planned, and funded multimodal infrastructure at potential station locations at a neighborhood, community and regional level of detail.

c. Passenger transportation systems in international contexts that are similar to the Willamette Valley in size and population characteristics should be studied to determine if there are lessons that can be applied when developing alternatives.

d. Based on present trends, identify and consider how future demographic, cultural, business, and technological shifts could affect the project.

Evaluation Criteria:

a. Connectivity: Alternatives should include the range of local transportation connections available to connect to the proposed service. Alternatives should and include total (door-to-door) travel time.

b. Local land uses: Alternatives should be evaluated to determine whether they complement or enhance existing and planned land uses, particularly at station areas, in a manner consistent with Statewide Planning Goals and local comprehensive plans.
c. Consistent with local comprehensive plan: Alternatives should be evaluated using local comprehensive plans. Many local governments within the study area have comprehensive plan policies regarding passenger travel. Consider regional plans from metropolitan areas. If an alternative is inconsistent, coordinate with the local government to evaluate potential comprehensive plan amendments.

d. Meeting travel demand: Each alternative should be rated on how it meets demand for passenger travel in each market served by the alternative.

e. Mode share: Estimate passenger mode share between each travel market served by the alternative. Passenger mode share should include travel by automobile.

f. Greenhouse gas emissions: Estimate the GHG emissions added or avoided by the alternative.

g. Accessibility: Measure the ease of access to the proposed service for all members of society, no matter their age, ability, income, or other status.

h. Health Impact: Measure the impact on public health, both positive and negative. This evaluation should include impacts related to travel safety, air quality, and physical activity.

i. Capital costs: The capital costs for each alternative should be estimated at an order-of-magnitude range. Costs for phased alternatives should be broken out by phase.

j. Operating costs: The operating costs for each alternative should be roughly determined.

k. Travel time: Estimate travel time between travel markets. All markets should be included, not only Portland-Eugene endpoints. Include selected measures of door-to-door travel times. We believe travel time is a better measure than top speed, as speed will vary along the corridor and top speed will only be attained for a part of any trip.

l. Frequency: Estimate the frequency and span of service for affected travel markets.

m. Capacity: Estimate the interim and ultimate passenger capacities of the system.

n. Network connectivity: Each alternative should be evaluated on how well it would connect to the rest of the passenger transportation system, both locally and regionally.

o. Freight rail impacts: The impact of each alternative on freight rail service should be determined. Specific benefits or costs to existing or potential freight rail service should be identified.

p. Resource land: Consider the impact of each alternative on adjacent farm and forest land. A goal exception is not required for railroad improvements. Consider alignments that minimize impacts to agricultural practices where reasonable.

When possible, utilize existing measures and methods when developing evaluation criteria. When making evaluations between alternatives on a qualitative basis, e.g., dollar amounts or ridership numbers, each alternative should use the same interim and horizon years.
7. Additional Comments and Suggestions

If we understand correctly, this project will result in amendments to the Oregon Transportation Plan; the OTP’s modal plans, particularly the rail plan; local TSPs; or RTPs/RTSPs for areas served by metropolitan Organizations. It would help to clarify this as the project moves forward.

The project should be coordinated and consistent with other ongoing planning efforts, including implementation of the Statewide Transportation Strategy.

We appreciate the opportunity to comment. We look forward to making ongoing contributions to the project over the next several years.

Sincerely,

Mathew Crall, AICP
Planning Services Division Manager

CC: DLCD Passenger Rail Group