

Date: October 21, 2025
To: Kim Ellis, Climate Program Manager; Ally Holmqvist, Senior Transportation Planner
From: Jesse Stemmler, Interim 82nd Avenue Transit Project Director
Subject: 82nd Avenue Transit Project RTP Amendment Request

Overview

This memo formally requests an amendment to the [Regional Transportation Plan \(RTP\)](#) to incorporate the [Locally Preferred Alternative \(LPA\)](#) for the 82nd Avenue Transit Project and contains the background information needed to help Metro Staff to review the requested amendment for consistency with the RTP and develop the legislation and supporting staff reports for consideration by the Transportation Policy Alternatives Committee (TPAC), Metro Technical Advisory Committee (MTAC), Metro Policy Advisory Committee (MPAC), Joint Policy Advisory Committee on Transportation (JPACT), and the Metro Council.

Background

82nd Avenue supports the movement of people and goods in a diverse and growing area, connecting people to essential jobs, education facilities, shopping and community services from Clackamas Town Center to Portland's Cully neighborhood. Once the area's primary north-south highway before Interstate 205 opened in 1983, 82nd Avenue has long been a critical regional mobility corridor, and the importance of transit and pedestrian connections has only grown since that time. A substantial number of people continue to travel the corridor each day to get where they need to go and more people are anticipated to do so in the future.

The purpose of the 82nd Avenue Transit Project is to improve transit speed, reliability, capacity, safety, comfort, and access on 82nd Avenue, which is one of the most important transit corridors in the region (see Appendix A for the Initial Purpose and Need Statement approved by the project's Steering Committee). The Project seeks to address the needs of people who live, work, learn, shop, and travel within the corridor both today and in the future through context-sensitive transit improvements in a constrained corridor. Currently, 82nd Avenue is served by TriMet's Line 72, which is the highest ridership bus line in Oregon and experiences the greatest passenger travel delay of all TriMet bus lines.

82nd Avenue has long been recognized as a priority corridor for high-capacity transit investment. It was included in the 2009 High Capacity Transit (HCT) Plan, the 2018 Regional Transportation Plan (RTP) and the 2018 Regional Transit Strategy. In 2019, Metro's Transportation Funding Task Force selected 82nd Avenue as a Tier 1 priority to include a bus rapid transit project. The 82nd Avenue corridor is included in the current 2023 RTP and was identified as a priority for high-capacity transit investment in the 2023 High Capacity Transit (HCT) Strategy.

In 2022, following years of community advocacy and a series of fatalities, the Oregon Department of Transportation (ODOT) transferred ownership of most of 82nd Avenue within the City of Portland to the Portland Bureau of Transportation (PBOT). This transfer created a unique opportunity to coordinate transit and corridor investments to leverage local funds and advance the goals of transit riders, safety advocates, pedestrians, and local communities. In June 2022, Metro convened a Steering Committee composed of local agency partners and representatives from four community-based organizations—Oregon Walks, Clackamas Resource Center, Unite Oregon, and the 82nd Avenue Business Alliance. This committee was established to guide the project toward a Locally Preferred Alternative (LPA) that reflects regional consensus on the project parameters of the

initiative. After extensive public engagement, technical analysis, collaboration across agencies, and direction from the steering committee, the Steering Committee unanimously recommended an LPA on January 16, 2025.

Following the Steering Committee recommendation, the LPA for the project was endorsed as follows:

- The TriMet Board of Directors unanimously adopted Resolution 25-03-15, to recommend confirmation of the LPA on March 26, 2025.
- The Port of Portland submitted a letter of support on May 2, 2025.
- The Oregon Department of Transportation submitted a letter of support on May 5, 2025.
- The Multnomah County Board of Commissioners unanimously adopted Resolution No. 2025-023, to adopt the LPA on April 17, 2025.
- The Portland City Council adopted Resolution No. 37706, to adopt the LPA and Conditions for Approval on May 21, 2025.
- JPACT approved Resolution No. 25-5495 and submitted the resolution to the Metro Council for approval on June 12, 2025.
- The Board of Clackamas County Commissioners submitted a letter of support on June 10, 2025.
- Metro Council adopted Resolution No. 25-5495 endorsing the LPA on June 26, 2025.

Project Description and Map

The 82nd Avenue Transit Project (Project) would implement a new bus rapid transit (BRT) line and related improvements in a 10-mile corridor in Portland and unincorporated Clackamas County, Oregon. The BRT line would be built and operated by TriMet. The line would connect the NE Cully Boulevard and NE Killingsworth Street area in Portland and the Clackamas Town Center Transit Center in Clackamas County, running primarily along NE/SE 82nd Avenue. It would operate as Frequent Express (FX) service, TriMet's brand of BRT, and would replace a portion of the existing 72-Killingsworth/82nd TriMet bus line.

The following agency partners will help deliver the project:

- TriMet will be the Project Sponsor and the Grantee for the FTA CIG Small Starts program.
- Metro will lead the environmental analysis and approvals required under NEPA.
- PBOT, Clackamas County, and ODOT are project partners supporting Project Development activities.
- The Federal Transit Administration is the lead federal agency for NEPA and a key financial partner through the FTA's CIG Small Starts program.

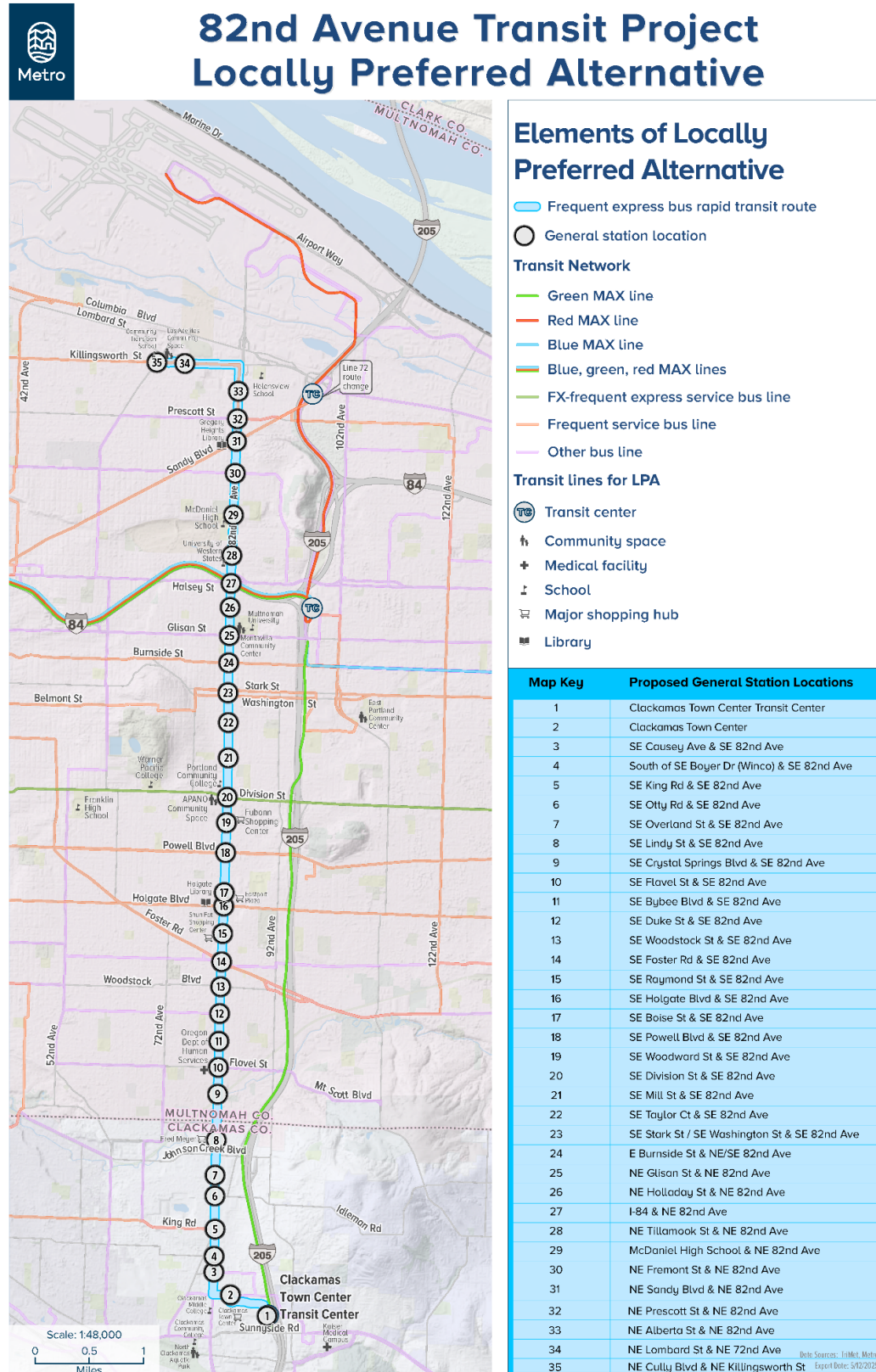
The Project includes the following scope elements:

- 68 station platforms at 35 stations – pick up locations will have upgrades including weather protection, seating, real-time information, and lighting
- Sidewalk, curb ramp, accessibility, and crossing improvements at station locations
- New signals, signal upgrades and improvements to benefit transit
- Roadway improvements/repaving at station areas
- Higher capacity hydrogen electric articulated buses
- Continuing discussions on physical transit priority through Business Access and Transit (BAT lanes)

Figure 1 outlines the project area and endorsed LPA, which starts at NE Cully Boulevard and NE Killingsworth Street in Portland and ends at Clackamas Town Center Transit Center in Clackamas

County. The northern extent of the LPA differs from the conceptual draft alignment reflected in the RTP transit network and project maps which will be updated.

Figure 1: Project Area Map



Project Development Phase Schedule and Deliverables

The Locally Preferred Alternative being amended into the RTP will support further progress on the Project and is a required step to qualify for key federal funding opportunities. It is necessary to complete the NEPA process covering all aspects of the project proposed for FTA funding, develop sufficient information for FTA to develop a project rating, complete sufficient engineering and design to develop an accurate and reliable cost, scope, and schedule for the Project, obtain all non-CIG funding commitments, complete all critical third-party agreements, meet other FTA readiness requirements, and ultimately prepare for construction. The Project formally entered the Project Development phase in July 2025, with Project Development anticipated to be completed in spring 2027, with service opening in summer 2029.

The Project Development phase includes required deliverables that will be informed by the core design team, project partners, and community engagement, including:

- Completion of environmental approvals under the National Environmental Policy Act (NEPA).
- Development of preliminary design and engineering documents.
- Development of materials necessary for a Small Starts rating by FTA and subsequent Small Starts Construction Grant Agreement.

The anticipated schedule for Project Development phase deliverables is as follows:

- Preliminary design and engineering (summer 2024 – spring 2026)
 - 15% design (early 2025)
 - 30% design (summer 2025)
 - 60% design (spring 2026)
- Draft finance plan (early 2025)
- Initial Small Starts application for rating (early 2025)
- Update to the Regional Transportation Plan and related financial elements, as necessary (fall 2025- summer 2026)
- Environmental approvals under NEPA (early 2025 – spring 2026)
 - Class-of-Action determination (anticipating a documented categorical exclusion)
 - NEPA assessment and findings, including all needed analysis and public engagement
- Small Starts construction grant agreement (spring 2027)
- Final design and construction Documents (fall 2026-spring 2027), including cost estimates for each stage documenting the total anticipated construction cost in year of expenditure dollars:
 - 90% Design package (fall 2026)
 - 100% Design – issued for construction (spring 2027)

The proposed time period for the Construction phase spring 2027-summer 2029.

Public Engagement

Metro and TriMet staff offered several opportunities for community members to learn about and provide input on the 82nd Avenue Transit Project. Many of public engagement events were co-hosted with the Portland Bureau of Transportation (PBOT) as part of their Building a Better 82nd Avenue Project to allow community members to provide input on both projects and clarify scope and purpose of each project. A demographic assessment was conducted as part of the development of the [Existing Conditions](#) report.

Additionally, members of the 82nd Avenue Coalition and community based organizations were represented on the Steering Committee, which was the decision-making body for the LPA. Appendix B includes the full summary of public engagement activities and input. Public engagement will continue to be an important aspect of the project moving forward.

Two key ways in which community engagement shaped the Project were:

- *Northern terminus selection:* To understand and address community compatibility concerns around a potential Cully neighborhood terminus, the Project team formed the Cully Terminus Evaluation Group. From July to October 2024, staff collaborated with eight Cully residents to explore design options near NE Killingsworth St and Cully Blvd. The group identified preferred transit facility locations, emphasized pedestrian safety, and raised concerns about parking loss and traffic increases—leading to design adjustments. By the final meeting, all members supported a Cully terminus.
- *General station locations:* To understand and address potential community concerns regarding stop consolidation, several rounds of engagement were conducted. Public input guided the selection and refinement of station locations. Initial concepts were shaped by technical analysis and partner workshops, then reviewed through an online open house and four in-person workshops between April and August 2023. Participants provided location-specific feedback, shared placement priorities, and weighed in on “either/or” station options. Key themes included safer access, improved station amenities, personal security, and better connectivity. This feedback, combined with technical analysis, directly informed station siting and design.

RTP Consistency and Regional Significance

The Project advances the following RTP goals, objectives, and policies, and RTP modal function(s) of the facility:

Goal 1 – Mobility Options

- (Objective 1.1) Increases proportion of trips made by use of transit and reduces per capita vehicle miles traveled.
- (Objective 1.2) Completes gap in planned regional network.
- (Objective 1.3) Increases household and job access to frequent transit service.
- (Objective 1.4) Maintains reliable person-trip and freight mobility in a regional mobility corridor.

Goal 2 – Safe System

- (Objective 2.1) Contributes to eliminating fatal and severe injury crashes by 2035.
- (Objective 2.3) Maintains and brings facilities up to a state of good repair.

Goal 3 – Equitable Transportation

- (Objective 3.1) Contributes to eliminating disparities related to access, safety, affordability, and health outcomes experienced by people of color and other marginalized communities.
- (Objective 3.2) Contributes to eliminating barriers that people of color, people with low incomes, youth, older adults, people with disabilities, and other marginalized communities face to meeting their travel needs.

Goal 4 – Thriving Economy

- (Objective 4.1) Focuses growth and transportation investment in a designated 2040 growth area and provides access to jobs, markets, and community places within and beyond the region.
- (Objective 4.2) Maintains access to industry and freight intermodal facilities.
- (Objective 4.3) Attracts new businesses and family-wage jobs and retains those already located in the region while increasing the number and variety of jobs that households can reach within a reasonable travel time.
- (Objective 4.4) Reduces the share of income that households in the region spend on transportation to lower overall household spending on transportation and housing.
- (Objective 4.5) Bring facilities up to a state of good repair and avoid deferred maintenance.

Goal 5 – Climate Action and Resilience

- (Objective 5.1) Contributes to meeting adopted targets for reducing transportation-related greenhouse gas emissions and vehicles miles per capita.
- (Objective 5.2) Increases the share of jobs and households in walkable, mixed-use areas served by frequent transit service.
- (Objective 5.3) Preserves and protects the region’s biological, water, historic and culturally important plants, habitats, and landscapes, and integrates green infrastructure strategies to maintain habitat connectivity, reduce stormwater run-off, and reduce light pollution.
- (Objective 5.4) Increases the resilience of communities and regional transportation infrastructure to the effects of climate change and natural hazards including seismic events.
- (Objective 5.5) Brings facilities up to a state of good repair and avoid deferred maintenance to prevent future more costly and resource intensive repairs.

The Project is consistent with and supports implementation of the following RTP System, Regional Design and Regional Network Policies:

- *3.2.1 2040 Growth Concept:* The Project supports the Metro 2040 Growth Concept by advancing permanent high-capacity transit and higher-density growth along a designated Main Street of 82nd Avenue, as well as supporting planned land uses adopted in the 2040 Growth Concept by improving mobility to Regional Centers via transit.
- *3.2.2 Transportation Equity Policies:* The Project improves multimodal options and permanent transit access in several Equity Focus Areas.
- *3.2.3 Safety and Security Policies:* The Project advances safe access to transit on a Regional High Injury Corridor.
- *3.2.4 Climate Action Policies and Resilience Policies:* The Project supports Metro’s Climate Smart Strategy and related policies. It will advance a major high-capacity transit investment to make transit more convenient, frequent, and accessible. It will include improvements to the pedestrian network and connect the local street grid with safe crossings.
- *3.2.6 Mobility Policies:* The Project will advance mobility policies. It will improve transit and pedestrian travel and access, while balancing motor vehicle travel and the many other functions of arterials.
- *3.3 Regional Network Policies:* The Project supports regional network policies, including policies which aim to provide transit as an attractive, convenient, accessible, and affordable travel option. It supports RTP Policy Map designations for the Transit and Pedestrian networks.

Identification of the Project followed the RTP congestion management process policies in the following ways:

- The Project utilizes multiple tools in the Congestion Management Process (CMP) toolbox. It is planned to utilize transit signal priority and access management strategies to support system management and operations. It will utilize active transportation strategies by implementing new walking connections to key destinations. It will utilize transit strategies by constructing high capacity transit and expanding transit coverage.

The Project is regionally significant. In 2018, Metro adopted the region's first [Regional Transit Strategy](#), in support of the [2018 Regional Transportation Plan \(RTP\)](#). The RTP identified the 82nd Avenue as an Enhanced Transit Corridor (ETC) for short-term implementation and included the Project in its [financially-constrained project list](#) (12029). In 2023, Metro adopted the [Regional High Capacity Transit \(HCT\) Strategy](#) as part of [the 2023 Regional Transportation Plan update](#), which designates the Project as a Tier 1: near-term HCT corridor; this is the highest priority for near-term HCT investment in the region. The Project will also require project-level NEPA review. Additionally, 82nd Avenue is designated on multiple RTP network maps—transit, motor vehicles, bicycle, pedestrian, freight, and TSMO networks.

Performance

The Project makes progress toward federal and regional performance targets:

- *Mobility*, by increasing transit and pedestrian mode shares, improving access to jobs via transit, contributing to completing the transit network and the pedestrian system near transit, increasing the share of households that are located near transit and pedestrian facilities, and improving thoroughway reliability.
- *Safety*, by contributing to eliminating transportation related fatalities and serious injuries.
- *Equity*, by contributing to eliminating transportation related fatalities and serious injuries in equity focus areas, contributing to completing the pedestrian system in equity focus areas, and improving access to jobs within equity focus areas.
- *Economy*, by increasing the number and variety of jobs that households can reach within a reasonable time.
- *Climate and Environment*, by reducing per capita greenhouse gas emissions from light-duty vehicles and per capita vehicles miles traveled, helping to meet revised statewide goals requiring accelerated reductions in greenhouse gas emissions, and keeping air pollution from mobile sources levels below thresholds set by the federal government.

Fast, convenient and linked to the broader transit and transportation network – high capacity transit provides a viable, more affordable alternative to driving. Fewer cars on the road leads to less air pollution, more physical activity, less time in traffic, fewer crashes and more reliability for moving people and goods – supporting the health, safety, mobility, economy and quality of life of our region. As part of its evaluation, the 2023 High Capacity Transit Strategy found that implementing all of the corridor improvements identified in the vision would result in a 0.6% reduction in CO₂e emissions regionwide. [82nd Avenue landed in the top 20% of vision corridors evaluated where a high capacity transit investment would result in climate benefit.](#) The HCT Strategy's analysis found that a high capacity transit investment on 82nd Avenue could result in a reduction of around 190 metric tons of CO₂e per year.

The [2023 RTP Climate Smart Strategy \(CSS\)](#) states that implementing the Regional Transit Strategy vision of making transit convenient, frequent, accessible and affordable is a key strategy with a high

relative climate benefit. The CSS includes a number of near-term actions for Metro and partners related to high capacity transit, including: 1) expand transit service to serve communities of concern, transit-supportive development and other potential high ridership locations; and 2) expand partnerships with transit agencies, cities, counties and ODOT to implement capital improvements in frequent bus corridors (including dedicated bus lanes, stop/shelter improvements, and intersection priority treatments) to increase service performance.

To make progress toward the [Climate Smart Strategy](#) Performance targets, the Project implements elements of the 2040 Growth Concept and local and adopted land use and transportation plans; makes transit convenient, frequent, accessible, and affordable; makes walking safe and convenient; makes streets and highways safe and reliable; uses technology to actively manage the transportation system; provides information and incentives to expand the use of travel options; supports transition to cleaner low carbon fuels; secures adequate funding for transportation investments; and demonstrates leadership on climate change.

This is a safety project eligible for state and federal safety program funding, with Highway Safety Improvement Program funds committed for Project Development.

Fiscal Constraint

The cost estimate included in the [2023 RTP financially constrained project list](#) was \$300 million in year-of-expenditure dollars. That estimate has increased to approximately \$343 million based on refined design and partner priorities. Currently, \$30.63 million for Project Development has been committed, with an additional \$83 million committed from the FTA Low or No-Emissions Grant Program, the Portland Clean Energy Fund, and TriMet match for other federal funds. TriMet is pursuing FTA Small Starts Capital Investment Grant (CIG) funding and will seek up to the maximum Small Starts CIG funding amount of \$150 million. Additionally, the project was approved for Regional Flexible Fund Step 1A.1 New Project Bonds on July 31, 2025 by [Resolution 25-5510](#). Additional local sources, including those in Table 1 below, will be committed as required by the FTA CIG program.

As indicated in the Project Development section above, preliminary engineering, design, and construction will all occur in the 2023-2030 near-term RTP investment time period.

Table 1. 82nd Avenue Transit Project Fiscal Constraint Documentation

Fund Source and Type	Revenue Dollar Amount	New Revenue (not assumed in 2023 RTP Forecast)¹	Revenue Assumed in 2023 RTP Forecast - 82nd Avenue Transit Project (#12029)²	Proposed Shift Revenue in the 2023 RTP Forecast from 82nd Avenue Corridor Improvements Project (#11844)³
FTA CIG – 5309 Small Starts	\$150,000,000		\$150,000,000	
FTA – Areas of Persistent Poverty	\$630,000	\$630,000		
FTA – Low or No Emission Grant	\$23,800,000		\$23,800,000	
Regional Flexible Fund Bonds	\$28,000,000	\$28,000,000		
Portland Clean Energy Fund (PCEF) Grant	\$49,500,000	\$49,500,000		
State/Regional/Local Funds <ul style="list-style-type: none"> • TriMet – General Funds/Bonds • Carbon Reduction Program Funds • State revenues related to jurisdictional transfer 	\$92,000,000		\$71,000,000	\$21,000,000
Total⁴	\$343,930,000	\$78,130,000	\$244,800,000	\$21,000,000

¹These dollars are new revenues not accounted for in the forecast in the adopted 2023 RTP. The revenues include new funds awarded by PCEF on December 18, 2024 and the RFFA Bond revenues approved by JPACT and the Metro Council on July 31, 2025. While this amount is more than the cost increase for the project (\$43M) the budget also needs to demonstrate additional local revenue sources to make up for \$55.2M in state funding assumed in the 2023 RTP that is not part of the revenue sources assumed in the current project budget.

²These dollars are revenues already assumed for the 82nd Avenue Transit Project in the revenue forecast in the adopted 2023 RTP, covering the project's estimated cost in the adopted 2023 RTP.

³The current 82nd Avenue Transit Project financial plan includes \$21 million in State revenues related to the jurisdictional transfer of 82nd Avenue from ODOT to the City of Portland. These State revenues were accounted for in the adopted 2023 RTP revenue forecast, but not specifically committed to the 82nd Avenue Transit Project (RTP ID 12029); they were assumed to help fund the City's related 82nd Avenue corridor project (RTP ID 11844). The amendment proposes to reduce the cost of the corridor improvements (RTP ID 11844) by \$21 million and update the 82nd Avenue Transit Project financial plan to shift \$21 million of the state revenues assumed for the corridor project (RTP ID 11844) to the transit project (RTP ID 12029) to demonstrate fiscal constraint.

⁴Totals are generally rounded to the nearest \$100,000.

Attachments:

- [A: 82nd Avenue Transit Project Initial Purpose and Need Statement](#)
- [B: 2025 Engagement Summary](#)
- [C: Metro Council Staff Report on LPA Endorsement Recommendation June 26, 2025](#)
- [D: Existing Conditions](#)