

# Attachment 4

## STAFF REPORT

### FIRST READING FOR ORDINANCE 26-1536 FOR THE PURPOSE OF AMENDING THE 2023 REGIONAL TRANSPORTATION PLAN TO INCLUDE THE LOCALLY PREFERRED ALTERNATIVE FOR THE 82<sup>ND</sup> AVENUE TRANSIT PROJECT

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Date: January 28, 2026  
Department: Planning, Development and Research  
Meeting Date: March 5, 2026  
Prepared by: Ally Holmqvist, Senior Planner,  
ally.holmqvist@oregonmetro.gov

Length: 15 minutes  
Presenters:

- Ally Holmqvist, Senior Planner, Metro
- Melissa Ashbaugh, Senior Planner, Metro
- Jesse Stemmler, Interim 82nd Avenue Transit Project Director, TriMet

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## ISSUE STATEMENT

The Regional Transportation Plan (RTP) is the state- and federally-required long-range transportation plan for the Portland metropolitan area that guides planning and investment for all forms of travel – motor vehicle, transit, biking, and walking – and the movement of goods and freight. It includes a list of “financially constrained” projects eligible to move forward when there is funding and political support. The RTP was last updated in 2023.

In June 2025, the Joint Policy Advisory Committee on Transportation (JPACT) and the Metro Council endorsed the Locally Preferred Alternative (LPA) for the 82<sup>nd</sup> Avenue Transit Project identified as a regional priority in the 2023 RTP (and its element the High Capacity Transit Strategy) to improve transit speed, reliability, capacity, safety, comfort and access aligned with the vision established in the regional transit strategy. Planning to develop the LPA identified additional details and information that required amendments to the 2023 RTP. The amendments include updates to reflect:

- the endorsed LPA route alignment on the regional transit network map,
- LPA project description, cost and anticipated revenues, and
- the project timeline and status and related future corridor-refinement activities in appendices of the 2023 RTP.

Metro and regional partners have made significant progress on the 82nd Avenue Transit Project, as well as the Tualatin Valley Highway Transit and Safety Project and Montgomery Park Streetcar Extension, and are ready to take the next step in pursuing key federal funding opportunities. This is a key step of the project development lifecycle outlined in the HCT Strategy for these identified Tier 1 priorities (see **Attachment 1**). To be eligible for federal and state funding, the endorsed transit project must have its LPA adopted in the RTP. The next full RTP update must be completed by November 30, 2028.

The requested amendment will include the endorsed 82<sup>nd</sup> Avenue LPA as part of the 2023 RTP in order to support the project moving into project development and becoming eligible to compete for federal and state funding opportunities now.

## **IDENTIFIED POLICY OUTCOMES**

To reflect the LPA as previously endorsed by Metro Council resolution, the requested amendment includes the following:

- Amendment to Chapter 3 System Policies to Achieve Our Vision Regional Transit Network Map (Figure 3.24) to:
  - Revise the northern extent and terminus of 82<sup>nd</sup> Avenue corridor high capacity transit to match the Locally Preferred Alternative (to NE Cully Blvd /NE Killingsworth St from Sandy Blvd/Parkrose Sumner Transit Center).
- Amendments to Chapter 5 Our Transportation Funding Outlook and Chapter 6 Regional Programs and Projects chapter text and figures to reflect additional revenues related to the transit project not accounted for in the adopted 2023 RTP financial forecast.
- Amendments to the Appendix A: Constrained Priorities Project List to update project costs and descriptions for:
  - Project 12029: 82<sup>nd</sup> Avenue Transit Project to update the end location to NE Cully Boulevard (from TBD) and NE Killingsworth Street, add detail to the project description, and update the project cost to \$344M (from \$300M).
    - Project 11844: 82<sup>nd</sup> Avenue Corridor Improvements Project to update the project cost to \$119M (from \$150M).
- Amendments to Appendix W: Status of Current Major Projects to update description of the transit project to reflect endorsement of the LPA, including project status, timeline, maps and next steps.
- Amendments to Appendix V: Future Corridor Refinement Planning to update description for transportation solutions in the corridor to add or update information about the transit project in development.
- Create a new appendix that will contain the LPA: Appendix AA: 82<sup>nd</sup> Avenue Transit Project Locally Preferred Alternative
- Amendments to numbering, pagination, formatting and other scrivener's errors as needed.

## **ACTION REQUESTED**

Hold a public hearing on the proposed RTP amendment and review Ordinance No. 26-1536 For the Purpose of Amending the 2023 Regional Transportation Plan to Include the Locally Preferred Alternative for the 82<sup>nd</sup> Avenue Transit Project.

## **STAFF RECOMMENDATIONS**

Staff recommends that Metro Council hold the public hearing for and review Ordinance No. 26-1536.

Following the amendment procedures, Metro staff has reviewed the information submitted by TriMet (Attachment 2) and finds that the requested amendment to the 2023 RTP to

include the LPA for the 82<sup>nd</sup> Avenue Transit Project is regionally significant and consistent with the 2023 RTP and federal fiscal constraint requirements.

Metro Council is anticipated to consider adoption at the April 23 Council meeting following a recommendation from MPAC and action from JPACT.

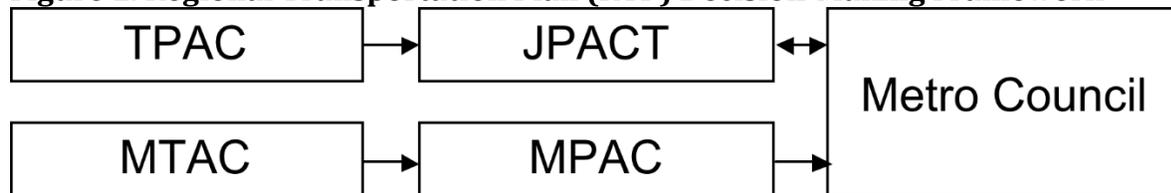
### **STRATEGIC CONTEXT & FRAMING COUNCIL DISCUSSION**

In 2023, JPACT and the Metro Council adopted a significant update to the RTP that brought together the input of thousands of people who live, work and travel across the greater Portland region. Meaningful engagement and consultation with Tribes, community members, community-based organizations, businesses, transportation agencies and elected officials contributed to a shared vision and strategy for investing in a transportation system that serves everyone. The 2023 RTP forwards the values and desired outcomes for the future of the region’s transportation system: mobility options, equitable transportation, climate action and resilience, safe system, and thriving economy.

As the federally-designated metropolitan planning organization for the Portland metropolitan area, Metro is responsible for developing and maintaining the RTP. As the regional government responsible for regional land use and transportation planning under state law, Metro is also responsible for developing and maintaining a regional transportation system plan, consistent with the Regional Framework Plan, statewide planning goals, the Oregon Transportation Planning Rule, the Metropolitan Greenhouse Gas Reduction Rule, the Oregon Transportation Plan, and by extension the Oregon Highway Plan and other state modal plans.

The Metro Council and JPACT jointly share responsibility for developing and adopting an updated RTP every five years to maintain compliance with federal and state requirements. Adoption or amendment of the RTP is a land use action under the statewide land use planning program. As such, the Metro Policy Advisory Committee (MPAC) serves in an advisory role to the Metro Council. This decision-making framework is shown in Figure 1.

**Figure 1. Regional Transportation Plan (RTP) Decision-Making Framework**



Amendments to the RTP are considered in between scheduled updates when a sponsoring agency requests changes to the funding, phasing, mode, function or general location of a project in the plan. There are several general sources for RTP amendment requests:

- (1) ODOT requests that require an amendment to the RTP for specific projects or the phasing of existing projects due to a funding decision by the Oregon State Legislature or other action by the Oregon Transportation Commission;

- (2) city or county requests involving transportation projects adopted through a public process in local transportation system plans, area plans, concept plans or studies;
- (3) transit agency requests to align adopted transit plans with the RTP;
- (4) public agency requests resulting from a National Environmental Policy Act (NEPA) review process to reflect the LPA adopted by project partners to allow the project to proceed and be eligible for federal funding; and
- (5) amendments resulting from a local, regional or state planning study or corridor refinement planning as defined in the Oregon Transportation Planning Rule, that involve additions or deletions to the RTP Financially Constrained project list or a significant change in the mode, function or general location of a project on the RTP Financially Constrained project list.

As described in Appendix Y of the RTP, such amendments require a recommendation from MPAC and adoption by the JPACT and the Metro Council by Ordinance.

**Attachment 3** describes in detail how the amendment is regionally significant and consistent with the 2023 RTP and related public engagement procedures for amendments to the RTP. **Table 1** below provides a summary of the determination outcomes.

**Table 1. RTP Amendment Consistency Review Outcomes Summary**

<b>Process Step</b>	<b>Outcomes</b>
<u>Step 1</u> Sponsoring agency consults with Metro Staff	<i>Staff from TriMet (project sponsor) met with staff from Metro between <u>April and September 2025</u> on the requested amendment and the RTP consistency requirements. Metro staff also led the LPA process for the transit project.</i>
<u>Step 2</u> Sponsoring agency submittal	<i>Staff from TriMet submitted a memo for the requested amendment including the RTP consistency background information outlined in the RTP Project Amendment Checklist as outlined in Appendix Y: RTP Amendment Process in <u>October 2025</u>.</i>
<u>Step 3</u> Regional significance determination:	<i>In 2018, Metro adopted the region’s first Regional Transit Strategy, as an element of the RTP. The RTP identified 82<sup>nd</sup> Avenue as an Enhanced Transit Corridor for short-term implementation with the transit project identified in the financially constrained project list. In 2023, Metro adopted the Regional High Capacity Transit (HCT) Strategy as an element of the RTP, and designated this high capacity transit project as a Tier 1: near-term HCT corridor – the highest priority for near-term HCT investment in the region. The project will also require project-level NEPA review. Additionally, the project corridor is designated on multiple RTP network maps – including transit, motor vehicle, bicycle, pedestrian, freight, and TSMO networks.</i>

Process Step	Outcomes
<p><u>Step 4</u> Public engagement consistency determination:</p>	<p><i>TriMet submitted a signed Public Engagement and Non-discrimination Certification and Documentation Forms as part of the 2023 RTP certifying that they have:</i></p> <ul style="list-style-type: none"> <li>• <i>an adopted Title VI plan and implementation procedures;</i></li> <li>• <i>public engagement plans compliant with Title VI and Goals 1 and 12 for all adopted land use and/or transportation plans, strategies and studies including the project;</i></li> <li>• <i>conducted project-specific engagement and analyzed potential inequitable impacts for marginalized groups;</i></li> <li>• <i>conducted and will conduct non-discriminatory, inclusive engagement compliant with Title VI and Goals 1 and 12 where input followed best practices and helped shape the project; and</i></li> <li>• <i>retained records related to these public engagement activities in compliance with regulations.</i></li> </ul> <p><i>The LPA endorsement process documented the extensive, consistent project development public engagement activities since that time.</i></p>
Process Step	Outcomes
<p><u>Step 5</u> RTP consistency determination:</p>	<p><i>The requested amendment has elements demonstrating progress toward objectives under all five regional goals that:</i></p> <ul style="list-style-type: none"> <li>• <i>implement the Metro 2040 Growth Concept by advancing high-capacity transit along a Main Street improving mobility between Regional Centers via a transit solution supporting planned compact, higher density land uses;</i></li> <li>• <i>invest in a corridor identified for transit improvements on the RTP Transit Network Vision;</i></li> <li>• <i>improve transit and pedestrian travel and access, while balancing motor vehicle travel and the many functions of mobility corridors;</i></li> <li>• <i>improve multimodal options and access for Equity Focus Areas;</i></li> <li>• <i>provide safer alternatives to driving, advancing implementation of Vision Zero on a Regional High Injury Corridor;</i></li> <li>• <i>advance a major high-capacity transit investment to make transit more convenient, frequent, and accessible — a key strategy for implementing the Climate Smart Strategy;</i></li> <li>• <i>advance transit and pedestrian system completion in a job and activity center to provide safe and convenient options for short trips and connections to transit, supporting the economy; and</i></li> <li>• <i>plan to include transit signal priority and access management strategies to support system management and operations and are themselves transit strategies for increasing corridor capacity as part of the Congestion Management Toolbox.</i></li> </ul> <p><i>In all these ways, the requested amendment has been determined to support the region’s progress toward both federal and regional performance targets. All project amendments (additions and deletions) are exempt from the federally-required air quality conformity analysis.</i></p>

**(continued) Table 1. RTP Amendment Consistency Review Outcomes Summary**

<b>Process Step</b>	<b>Outcomes</b>
<b>Step 6</b> Fiscal constraint determination	<p>The estimated cost for the 82<sup>nd</sup> Avenue Transit Project increased from \$300M to \$344M. This \$99M difference is accounted for in:</p> <ul style="list-style-type: none"><li>• \$50M in new revenue (i.e., FTA Areas of Persistent Poverty Grant, Portland Clean Energy Fund Grant) not included in the RTP forecast;</li><li>• \$28M in regional revenue (i.e., Regional Flexible Fund Bond approved by JPACT and the Metro Council in 2025); and</li><li>• \$21M in State revenues related to the jurisdictional transfer of 82nd Avenue from ODOT to the City of Portland assumed to help fund the City’s related 82nd Avenue corridor project (RTP ID 11844). The amendment proposes to shift the \$21 million in state revenues assumed to help fund the 82nd Avenue Corridor Improvements project (RTP ID 11844) to the 82nd Avenue Transit Project (RTP ID 12029) to demonstrate fiscal constraint.</li></ul>
<b>Step 7</b> Begin Formal Amendment Process	<p>The RTP Amendment Process was initiated with the start of the public review period on <u>November 3, 2025</u>. Per Metro’s adopted Public Engagement Guide, advance notice of the public comment period was provided 30 days in advance. This process was consistent with Metro’s public engagement and established RTP amendment procedures.</p> <p><b>Attachment 2</b> provides the process and timeline for considering the requested RTP amendment. To date that has included:</p> <ul style="list-style-type: none"><li>• a 45-day public comment period which concluded on December 19, including a public hearing on December 4</li><li>• Documentation of public comments and recommended actions in response (see <b>Attachment 4</b>)</li><li>• Form 1 Notice to the Department of Land Conservation and Development on January 28</li></ul> <p>Next steps in the process will include:</p> <ul style="list-style-type: none"><li>• Consideration by MTAC and TPAC (making recommendations to MPAC and JPACT) this spring</li><li>• Consideration by JPACT and MPAC this spring</li><li>• Consideration by Metro Council (second reading and adoption anticipated April 23)</li><li>• Form 2 Notice to the Department of Land Conservation and Development by May 12</li></ul>

**Known Support and Opposition**

Overall, public input and prior endorsements demonstrate support for the transit project LPA by agency partners, local jurisdictions, and community-based organizations across the region. Extensive technical analysis was conducted to understand the benefits and tradeoffs of different LPA components for the project. Analysis was shared with community

members for feedback. Public engagement has been extensive and coordinated with agency partners and outreach for the associated Building a Better 82nd Avenue project. Additionally, the project has demonstrated compliance with Title VI and regional public involvement requirements.

At the public hearing held during the comment period on December 4<sup>th</sup>, there was one comment in opposition to transit priority lanes being constructed as part of the project. It is important to note that neither the Locally Preferred Alternative nor the proposed amendments include this level of detail (rather route and station locations), as design is part of project development to occur in the next phase. This comment is detailed in the public comment report provided in **Attachment 4**.

### Legal Antecedents

Metro Council actions include:

- Resolution No. 09-4025 (For the Purpose of Adopting the Regional High Capacity Transit System Plan Screened Corridor Map and Evaluation Criteria), adopted by the Metro Council on February 12, 2009.
- Resolution No. 09-4052, “For the Purpose of Accepting the Regional High Capacity Transit System Tiers and Corridors, System Expansion Policy Framework and Policy Amendments” adopted by the Metro Council on July 9, 2009.
- Ordinance No. 10-1241B (For the Purpose of Amending the 2004 Regional Transportation Plan to Comply with State Law; To Add the Regional Transportation Systems Management and Operations Action Plan, the Regional Freight Plan and the High Capacity Transit System Plan; To Amend the Regional Transportation Functional Plan and Add it to the Metro Code; To Amend the Regional Framework Plan; And to Amend the Urban Growth Management Functional Plan), adopted by the Metro Council on June 10, 2010.
- Resolution No. 10-4119 (For the purpose of updating the work program for Corridor Refinement Planning through 2020 and Proceeding with the Next Two Corridor Refinement Plans in the 2010-2013 Regional Transportation Plan Cycle), adopted by the Metro Council on February 25, 2010.
- Ordinance No. 14-1346B (For the Purpose of Adopting the Climate Smart Communities Strategy and Amending the Regional Framework Plan to Comply with State Law), adopted by the Metro Council on December 18, 2014.
- Ordinance No. 18-1421 (For the Purpose of Amending the 2014 Regional Transportation Plan to Comply with Federal and State Law and Amending the Regional Framework Plan), adopted by the Metro Council on Dec. 6, 2018.
- Resolution No. 18-4892 (For the Purpose of Adopting the 2018 Regional Transit Strategy and Replacing the 2009 High Capacity Transit System Plan), adopted by Metro Council on Dec. 6, 2018.
- Ordinance No. 23-1496 (For the purpose of Amending the 2018 Regional Transportation Plan (RTP) to Comply with Federal and State Law and Amending the Regional Framework Plan), adopted by the Metro Council on November 30, 2023.

- Resolution No. 23-5348 (For the Purpose of Adopting the 2023 High Capacity Transit Strategy), adopted by the Metro Council on November 30, 2023.
- Resolution No. 25-5495 (For the purpose of endorsing the Locally Preferred Alternative for the 82<sup>nd</sup> Avenue Project), adopted by the Metro Council on June 26, 2025.

Local jurisdiction actions include:

- The TriMet Board of Directors unanimously adopted Resolution 25-03-15, to recommend confirmation of the Locally Preferred Alternative for the for the 82nd Avenue Transit Project on March 26, 2025.
- The Multnomah County Board of Commissioners unanimously adopted Resolution No. 2025-023, to adopt the Locally Preferred Alternative for the 82nd Avenue Transit Project on April 17, 2025.
- The Board of Clackamas County Commissioners, the Oregon Department of Transportation, and the Port of Portland endorsed the Locally Preferred Alternative for the 82<sup>nd</sup> Avenue Transit Project with letters of support dated June 10, 2025, May 5, 2025, and May 2, 2025, respectively.
- The Portland City Council adopted Resolution No. 37706, to adopt the Locally Preferred Alternative for the 82nd Avenue Transit Project and Conditions for Approval on May 21, 2025.

Anticipated Effects: Adoption of the Ordinance will allow project staff to continue working with TriMet and partners on the project to:

- Pursue federal funding
- Complete federally-required National Environmental Policy Act (NEPA) documentation
- Refine design and costing
- Coordinate with partners
- Support the implementation and construction of the project
- Open a new FX bus line along 82nd Avenue in 2029

Budget Impacts: Adoption of the Ordinance has no budget impact at this time. There will be future costs associated implementation of the transit projects. These costs will be shared by local, regional, state and federal partners.

## **ATTACHMENTS**

- Attachment 1: High Capacity Transit Project Development Lifecycle
- Attachment 2: Transit Project Locally Preferred Alternative RTP Amendments Updated Process Timeline
- Attachment 3: 82<sup>nd</sup> Avenue Transit Project Locally Preferred Alternative RTP Amendment Request Memo
- Attachment 4: Public Comment Report (2025)

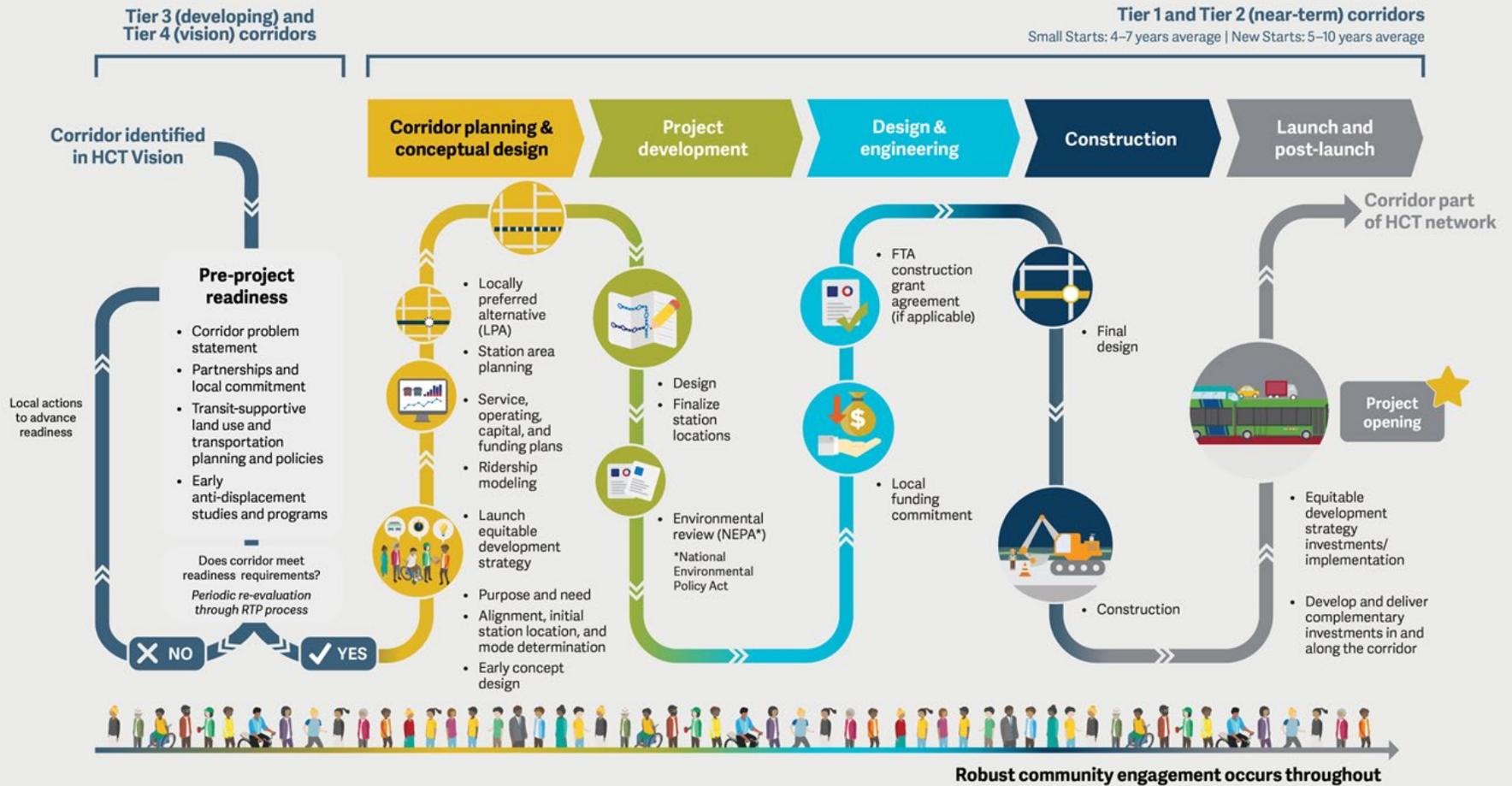
# Attachment 1

## High Capacity Transit Project Development Lifecycle

### How will corridors move forward?

The figure below shows how corridors move through different stages of planning, engineering, and construction.

Tier 1 and 2 corridors are ready to move forward in the near term, while tier 3 and 4 corridors need more work to make them ready for investment.



## Transit Project Locally Preferred Alternative 2023 Regional Transportation Plan Amendments Process Schedule

Below is a consolidated schedule showing the timeline for considering adoption of the proposed 82<sup>nd</sup> Avenue, Montgomery Park Streetcar, and TV Highway 2023 Regional Transportation Plan amendments.

Round	Meeting	Actions Necessary	Documents Necessary	Date
<b>Public Comment Period (45 days)</b>  <i>DLCD Proposed Change PAPA Notice (post acknowledgement plan amendment)</i>	45 Day Comment Period	<ul style="list-style-type: none"> <li>Public notice of comment period 30 days in advance of start of comment period – Friday, October 3</li> <li>Public notice of comment period at start of comment period</li> <li>Amendment documents posted on Metro website</li> <li>Notice of public comment period emailed to Metro committees and RTP/Transportation Planning interested parties' lists</li> </ul>	Public review and public hearing amendment materials: <ul style="list-style-type: none"> <li>Ordinance</li> <li>Exhibit(s) to Ordinance                             <ul style="list-style-type: none"> <li>RTP Amendment</li> </ul> </li> <li>Staff Report<sup>1</sup></li> <li>Attachments to Staff Report</li> <li>Documented Public Comment Print Notices</li> </ul>	<u>November 3 – December 19, 2025</u>
	Metro Council	Public Hearing		<b>December 4, 2025</b>
	<i>Notice of Proposed Change to Plan (Form 1)</i>	<i>Email PAPA notice with required attachments for each amendment (submit to DLCD 35 days before first reading)</i>		January 28, 2026
<b>1<sup>st</sup> Reading and Public Hearing</b>  <b>Introduce RTP Amendments to Advisory Committees</b>	TPAC	<ul style="list-style-type: none"> <li>Review and discuss, identify any needed changes</li> </ul>	Revised draft amendment materials: <ul style="list-style-type: none"> <li>Ordinance</li> <li>Exhibit(s) to Ordinance                             <ul style="list-style-type: none"> <li>RTP Amendment</li> </ul> </li> <li>Staff Report<sup>2</sup></li> <li>Attachments to Staff Report                             <ul style="list-style-type: none"> <li>Draft Public Comment Report</li> <li>Table documenting comments proposing a change and recommended action(s) to respond to public comment</li> </ul> </li> </ul>	<b>February 6, 2026</b>
	MTAC	<ul style="list-style-type: none"> <li>Review and discuss, identify any needed changes</li> <li>1st Reading and Public Hearing</li> </ul>		<b>February 18, 2026</b>
	JPACT			<b>February 19, 2026</b>
	MPAC			<b>February 25, 2026</b>
	Metro Council			<b>March 5, 2026</b>
<b>Final rec'ds and action by Advisory Committees and Council</b>  <b>2<sup>nd</sup> Reading, Final Public Hearing and action</b>	MTAC	<ul style="list-style-type: none"> <li>Review final documents</li> <li>Make recommendation to MPAC on their adoption recommendation</li> </ul>	Final: <ul style="list-style-type: none"> <li>Ordinance</li> <li>Exhibit(s) to Ordinance                             <ul style="list-style-type: none"> <li>RTP Amendment (with any recommended actions incorporated)</li> </ul> </li> <li>Findings</li> <li>Staff Report<sup>2</sup></li> <li>Attachments to Staff Report                             <ul style="list-style-type: none"> <li>Final Public Comment Report</li> <li>Table documenting comments proposing a change and recommended action(s) to respond to public comment</li> </ul> </li> </ul>	<b>March 18, 2026</b>
	MPAC	<ul style="list-style-type: none"> <li>Review final documents</li> <li>Consider MTAC recommendation</li> <li>Make recommendation to Metro Council on adoption</li> </ul>		<b>March 25, 2026</b>
	TPAC	<ul style="list-style-type: none"> <li>Review final documents</li> <li>Make recommendation to JPACT on adoption</li> </ul>		<b>April 3, 2026</b>
	JPACT	<ul style="list-style-type: none"> <li>Review final documents</li> <li>Consider TPAC recommendation on adoption</li> <li>Consider adoption of Ordinance and make recommendation to Council</li> </ul>		<b>April 16, 2026</b>
	Metro Council	<ul style="list-style-type: none"> <li>Review final documents</li> <li>Consider MPAC recommendation and JPACT action</li> <li>2nd Reading and Final Public Hearing</li> <li>Consider adoption as recommended by JPACT (or remand to JPACT)</li> </ul>		<b>April 23, 2026</b>
<i>DLCD Adopted Change PAPA Notice</i>	<i>Notice of Adopted Change to Plan (Form 2)</i>	<i>Email PAPA notice with required attachments for each amendment (submit to DLCD within 20 days of adoption)</i>	<i>Include final documents above</i>	<i>May 12, 2026</i>

<sup>1</sup> Staff Report address RTP project amendments checklist in [RTP Appendix Y](#).

## Attachment 3

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

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### Overview

This memo formally requests an amendment to the [Regional Transportation Plan \(RTP\)](#) to incorporate the [Locally Preferred Alternative \(LPA\)](#) for the 82<sup>nd</sup> 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

82<sup>nd</sup> 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, 82<sup>nd</sup> 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 82<sup>nd</sup> Avenue Transit Project is to improve transit speed, reliability, capacity, safety, comfort, and access on 82<sup>nd</sup> 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, 82<sup>nd</sup> 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.

82<sup>nd</sup> 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 82<sup>nd</sup> Avenue as a Tier 1 priority to include a bus rapid transit project. The 82<sup>nd</sup> 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 82<sup>nd</sup> 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 82<sup>nd</sup> 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.

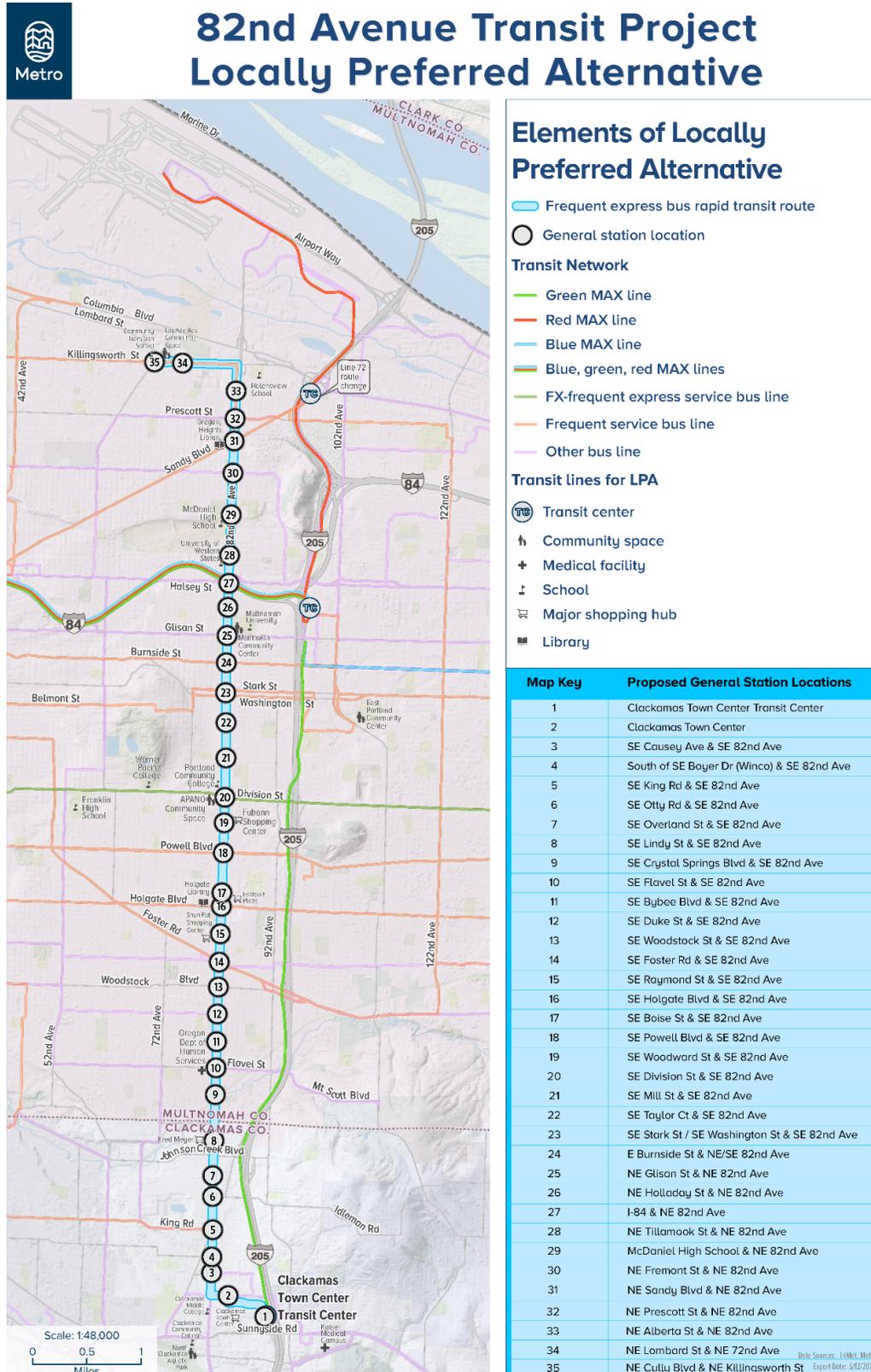
The Project includes the following scope elements:

- 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 82<sup>nd</sup> 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, 82<sup>nd</sup> 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 throughway 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 CO<sub>2</sub>e emissions regionwide. [82<sup>nd</sup> 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 82<sup>nd</sup> Avenue could result in a reduction of around 190 metric tons of CO<sub>2</sub>e 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**

<b>Fund Source and Type</b>	<b>Revenue Dollar Amount</b>	<b>New Revenue (not assumed in 2023 RTP Forecast)<sup>1</sup></b>	<b>Revenue Assumed in 2023 RTP Forecast - 82<sup>nd</sup> Avenue Transit Project (#12029)<sup>2</sup></b>	<b>Proposed Shift Revenue in the 2023 RTP Forecast from 82<sup>nd</sup> Avenue Corridor Improvements Project (#11844)<sup>3</sup></b>
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"> <li>• TriMet – General Funds/Bonds</li> <li>• Carbon Reduction Program Funds</li> <li>• State revenues related to jurisdictional transfer</li> </ul>	\$92,000,000		\$71,000,000	\$21,000,000
<b>Total<sup>4</sup></b>	<b>\$343,930,000</b>	<b>\$78,130,000</b>	<b>\$244,800,000</b>	<b>\$21,000,000</b>

<sup>1</sup>These 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.

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

<sup>3</sup>The current 82<sup>nd</sup> 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.

<sup>4</sup>Totals are generally rounded to the nearest \$100,000.

**Attachments:**

- [A: 82<sup>nd</sup> 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](#)

# ORDINANCE 26-1536 FOR THE PURPOSE OF ADMENDING THE 2023 REGIONAL TRANSPORTATION PLAN TO INCLUDE THE LOCALLY PREFERRED ALTERNATIVE FOR THE 82ND AVENUE TRANSIT PROJECT

## Report of Comments Received and Recommended Actions

(comments received November 3 through December 19, 2025)

The proposed amendments were released for public review from November 3 through December 19, 2025. Public agencies, advocacy groups and members of the public were invited to submit comments by mail, phone or online via Metro's website, and through testimony provided at a public hearing held by the Metro Council on December 4, 2025. This document summarizes recommended changes to respond to comments received during the comment period. New wording is shown in underline; deleted words are shown in ~~strikeout~~.

#	Line or Page	Last name	First name	Affiliation	Date	Method	Comment	Response	Proposed change identified in comment (changes shown in <del>strikeout</del> and <u>underline</u> )	Staff recommendation (changes shown in <del>strikeout</del> and <u>underline</u> )
1	N/A	Littlefield	Todd	Area resident	12/2/2025	Public Hearing Testimony	I live in Lents, one block from the TriMet no. 17 bus, and the park and ride on 94th and Holgate, so I am a big believer in transit. I'm here to talk about 82nd Avenue and making one lane each direction a bus lane. I'm not sure, because I haven't gotten an accurate count of how many cars use 82nd Avenue a day - I heard it's 20,000 plus. I don't know if that includes the bus passengers. 82nd is a massive thoroughfare for tens of thousands of people each day. That's going to destroy their commute and Holgate, Powell and Foster are a nightmare as-is during commute hours in the morning. 92nd is a nightmare as-is. So unless you are going to build 92nd out to four lanes then the 82nd proposal cannot happen. You're going to make life miserable for commuters and the businesses. The businesses I've talked to are against this if they are even aware of it. So in my opinion this issue is probably more like a 95/5 issue so I'm not sure why you would even vote for doing this. So if you could put it to a vote to the people, expand 82nd to widen it to put in more lanes for the bus, but the current proposal is really going to irritate people.	Thank you for your comment. Transit priority on 82nd Avenue is something that is being discussed as part the next phase of project development, with a recommendation anticipated in early 2026. The endorsed Locally Preferred Alternative and proposed amendment to the Regional Transportation Plan focuses on the route, termini, and general station locations, and does not include this level of detail on transit priority.	Comment does not propose a change to the amendments.	No change recommended.