

**Exhibit B to Resolution No. 23-5348**  
**2023 HCT Strategy Summary of Comments and Recommended Actions**  
(comments received 7/10/23 to 8/25/23)

September 29, 2023

Items for Consideration: Comments on Public Review Draft 2023 High Capacity Transit Strategy									
Comment #	Last Name	First Name	Affiliation	Method	Date received	Comment proposes a change? (Y/N)	Summary of Comment and Proposed Change Identified in Comment (changes shown in <b>bold-strikeout</b> and <u>underscore</u> )	Metro Staff Recommended Action in Response to Comment (changes shown in <b>bold-strikeout</b> and <u>underscore</u> )	Change Recommended (Y/N/TBD)
1	Bubenik	Frank	City of Tualatin	Letter	8/24/2023	Y	Request that the RTP be revised to show the the OR 99W and I-5 corridors as Tier 2 (HCT) corridors. The proposed High-Capacity Transit Strategy was based on modeling that does not consider trips into or out of the region, and thus underestimates the demand and need for transit in the Tualatin area and similar communities near the edges of the region. In particular, this results in a lower ‘tier’ for the OR 99W corridor and essentially missed the I-5 corridor. Several thousand employees in Tualatin commute from outside the Metro region, and we would estimate similar percentages for similar cities. If good transit service met these commuters on OR 99W near Sherwood or on I-5 near Wilsonville, they could enjoy riding transit to employers in Portland, Hillsboro, Tualatin, and the rest of the region while the region would significantly reduce overall VMT and resulting emissions. We are confident that if all trips are considered, the OR 99W and I-5 corridors would more than justify being Tier 2 corridors; we respectfully request that the RTP be revised to show them as Tier 2 corridors.	No change recommended at this time. In addition to WCCC and WCCC TAC, a working group worked closely on all of the milestones for the strategy that included representation from Washington County. Guided by the policy framework, we worked with that group of partners to develop criteria and an approach for reimagining a stronger, expanded system best serving growing and changing regional needs that: - forwards regional goals and investment priorities within the 2018 RTP HCT Readiness and Assessment criteria (previewed at the summer meetings); - maintains consistency with the Federal Transit Administration’s Capital Investment Grant Program project justification criteria to tie to funding historically critical to implementation success; - reflects the greater Portland region’s history of success with and capacity to engage in the Federal Project Development process (advancing one corridor every three years); and - considers investments within the RTP horizon (at a reasonable scale, <20 corridors in 2009 High Capacity Transit Plan and 2018 Regional Transit Strategy) and beyond. The tier buckets reflect the corridors that demonstrate the most needs near-term, best meet regional goal outcomes, and have the greatest competitiveness for federal funding, limited to a reasonable number based on timelines tied to and our historical regional capacity for advancing corridors. Since the criteria and guiding policy framework were developed closely with partners, this is the basis for the technical results used to establish the tiers with room for technical adjustments. This is a different process than establishing corridors of regional priority like the funding measure did for instance, although that framework did influence the overall vision. On specific corridors of concern: WES/I-5 corridor: Initial letters we received from Tualatin and Washington County included requests to continue to consider WES for investments (still a strategic investment in project #10900 and #11751), for instance in addition to rapid bus on Hall Boulevard, and for considering improvements nearer-term. This is something we are also identifying in the forthcoming corridor-specific matrix and something for consideration for Chapter 8 in the next RTP. While there is strong community support for this corridor and good employment density, the land use demand and policies and key destinations and access for the corridor could still be strengthened. This corridor also is not serving a higher proportion of regional equity focus areas in line with our goals. Additionally, the cost per rider is very high and there is an added challenge in pursuing additional federal funding on this corridor due to the fact that we have already received funding and need a very strong case for how additional funding could support more ridership and why we are confident in the outcome. This is a key reason that we have proposed additional corridor study take place to identify the correct solution(s) from the several options available. For all of the reasons above, this corridor is not yet showing the readiness for high capacity investment indicative of a Tier 2 designation.	N
2	Iannarone	Sarah	The Street Trust	Letter	8/25/2023	N	Expresses support for the transit policies and proposed pipeline of near- and long-term regional HCT investment tiers, understanding not all of the corridors identified in the vision are ready for high capacity transit and that the region must make hard choices about prioritizing where to invest first by considering which corridors will provide the most benefit now and in the future.	No change recommended; comment expressed support for transit policies and investment tiers.	N
3	Lueb	Heidi	City of Tigard	Letter	8/25/2023	N	Expresses support for Southwest Corridor Light Rail project as a “Tier 1” near-term priority corridor.	No change recommended. Comment noted.	N
4	Lueb	Heidi	City of Tigard	Letter	8/25/2023	N	Expresses support of newly identified “Tier 3” HCT routes C4 and C6 that would provide new and improved transit connectivity to destinations and cities within Clackamas County.	No change recommended. Comment noted.	N
5	Lueb	Heidi	City of Tigard	Letter	8/25/2023	N	Expresses disappointment that “Tier 4” C2, the Pacific Highway corridor between Tigard and Sherwood, received the lowest tier ranking, but understands, and commits to working to advance the corridor along with “Tier 4” corridor, C3.	No change recommended. Comment noted.	N
6	Charles	John	Cascade Policy Institute	Letter	8/25/2023	Y	Recommends significant changes to the high-capacity transit strategy to serve job centers other than downtown Portland and support smaller services that provide better coverage throughout	No changes recommended. While the share of regional jobs accessible by transit (within 45 minutes during peak hours) is low (7%), 64% of jobs were located within walking distance of a frequent transit station.	N

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							<p>the region. Argues that high-capacity transit in the region has not been successful and that Portland is not recovering from pandemic-era losses of jobs downtown.</p>	<p>The COVID-19 pandemic has reduced the central city's role and travel draw, but it is still a major center and travel destination. We've seen other centers increase in relative travel draw during this period, to a level closer to that of the central city. We also saw travel patterns change. While many more people stayed working from home, many trips to destinations besides work (e.g., services, commerce, restaurants, medical) via transit held steady. Further, we are seeing travel patterns continue to change - many people are back in the office a few days a week with more flexibility around hours that has shifted peak travel times. Ridership during the pandemic also declined the least on routes/corridors serving retail and service sector jobs and lower-income areas and areas with households with limited access to personal vehicles. Ridership is still down (about 30%) and the 2023 RTP makes more modest assumptions about ridership due to that (including that 10-30% of riders have not returned in 2025). However, ridership is anticipated to increase as service fully recovers and increases with implementation of Forward Together which also responds to changing travel patterns to increase efficiency as well as other factors (e.g., growth, transit-supportive actions, additional investment through the 2023 RTP project list).</p> <p>The 2023 RTP base year (2020) has about 82,000 jobs in the central city central business district and then an additional 75,000 jobs within the central city but outside the CBD and this number is expected to increase by 13% by 2045 to add another 30,000 jobs. So in short, the central city is still an important center for jobs and commerce. However, so are regional centers and reflecting that and enhancing key connections to these growing hubs was a key part of updates in TriMet's Forward Together service concept as well as the High Capacity Transit Strategy.High capacity transit plays an important role in connecting growing major travel centers and needs a higher level of capital investment to achieve the capacity for serving the higher number of trips along these corridors, as well as to provide comfort, convenience similar to driving to encourage mode shift. These are also important collaborative regional projects to transform corridors into transit-supportive environments.</p> <p>The High Capacity Transit Strategy reaffirms a regional commitment to improving high capacity transit service along the Beaverton to Wilsonville major travel corridor, which could include improvements to WES and/or complementary service via another mode. The strategy also affirms that additional study is needed given the unique opportunities and challenges for this corridor to identify the right solution.</p> <p>The High Capacity Transit Strategy does focus on connections to centers outside of the central city to move away from the hub and spoke system focused on the central city, to creating broader, more gridded connections between other regional and town centers in areas across the region (as identified in the 2040 Growth Concept). As mentioned previously, TriMet's Forward Together service concept shifts service emphasis from the central city to more of these centers of jobs and commerce elsewhere in the region.</p>	

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								<p>The Connecting First and Last Mile Study outlined in Section 8.2.3.3 will expand on work done by partners to create a policy framework and strategy for microtransit and other local transit solutions in the region. TriMet already provides the Honored Citizen discount hop pass program which both provides reduced fare and allows for collecting of ridership information. This is supported by Transit Policy 11 in the RTP which encourages additional actions making transit affordable to those with low incomes. Metro's transit-oriented development projects opening between just between January 2021 and June 2022 will generate 260,325 additional transit trips annually. Each year, over 1.65 million more travel trips are made by transit, rather than by car, as a result of TOD program supported projects. TOD projects increase the supply of housing in areas with lower commuting costs. As needs in the region have changed, the large majority of new TOD supported projects now include affordable units. Projects opening this period provided 866 housing units, including 788 regulated affordable units. To date, the TOD program has supported construction of approximately 6,281 housing units. Of these, approximately 2,677 are set aside for households earning 60% or less than the area medium income.</p> <p>This comment has also been forwarded to TriMet for consideration.</p>	
7	O'Brien	Tara	TriMet	Email	8/22/2023	Y	Reconcile report title with text- change "High Capacity Transit Strategy Update" references throughout to "High Capacity Transit Strategy".	Amend as requested.	Y
8	O'Brien	Tara	TriMet	Email	8/22/2023	Y	Use FTA's defined terms to distinguish between corridor-based BRT and fixed guideway BRT. Where BRT is used to indicate fixed guideway, spell this out throughout.	Amend as requested.	Y
9	O'Brien	Tara	TriMet	Email	8/22/2023	N	No change proposed. Expressed concern that the investments/benefits described often result in costs associated with a New Starts project.	No change proposed to address this comment, but changes are proposed for the more detailed comment below. This is an important point. Even when developing a New Starts project to provide these features and investments there are many trade-offs to consider as the level of need is often much greater than the transit project can provide on its own and why equitable development strategies are important and the report focuses on investments that partners can make on a corridor ahead of the transit investment to increase readiness. However, there is also benefit to consider (and different trade-offs) in a more nimble, flexible approach (including Small Starts but also for New Starts). This is an important regional conversation and something key to work on together as part of the BRT Implementation Plan which takes the next step from the HCT Strategy to answer these questions.	Y
10	O'Brien	Tara	TriMet	Email	8/22/2023	Y	Amend as follows: "Definition of Rapid Bus: This term refers to rubber-tired HCT modes that include bus rapid transit (BRT) and frequent express (FX)-style HCT services. In general, these services offer the core elements of HCT <u>including transit priority</u> , enhanced amenities, and frequent, branded service. Rapid bus is distinct from “better bus” improvements that focus on spot treatments for speed and reliability."	Amend as requested.	Y

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11	O'Brien	Tara	TriMet	Email	8/22/2023	Y	Add to end of second paragraph: <u>The level of amenities vary depending on the type of transit project or corridor project.</u>	Amend HCT strategy page 49 to add a call-out box as follows: " <u>High capacity transit provides substantial benefits to riders, in the form of increased service, higher capacity vehicles, enhanced amenities, specific branding, and other features. Traditionally, these types of investments have included important and also substantial corridor-wide investments in cycling and walking facilities, lighting and safety enhancements, and overall infrastructure upgrades (e.g., pavement, sidewalk replacement, stormwater, signals). While these provide a greatly-improved corridor when complete, these projects are very costly (at and often beyond the funding limits of a Small Starts or New Starts grant) and some corridor upgrades can be tangential to the purpose and need of the core transit project investments. These trade-offs and considerations are not unique to greater Portland. Other regions and agencies nationally have grappled with the same opportunities and challenges and pursued innovative and/or more nimble, flexible and less costly approaches to implementing a rapid bus network. Examples include pursuing projects more focused on transit investments (within the funding limits of a Small Starts grant) and or engaging in planning a rapid bus system that allows more corridors to move through project development at the same time. The 2023 Regional Transportation Plan outlines future work on a Bus Rapid Transit Implementation Plan that will advance the High Capacity Transit Strategy to consider how to best apply these types of strategies and implement Frequent Express investments within the framework of the high capacity transit vision to serve our region's goals.</u> "	Y
12	O'Brien	Tara	TriMet	Email	8/22/2023	Y	Amend as follows: "It also refers to amenities such as covered waiting areas, real-time bus or train arrival information, schedules, ticket machines, enhanced lighting, benches, bicycle parking, and even <del>civic art</del> and commercial services."	Amend as requested.	Y
13	O'Brien	Tara	TriMet	Email	8/22/2023	Y	Amend as follows: "At the same time, planning for the new Southwest Corridor MAX line is <del>moving forward</del> <u>remains a priority.</u>	Amend as requested.	Y
14	O'Brien	Tara	TriMet	Email	8/22/2023	Y	Remove FX vs Better Bus box.	Revise graphic to replace "FX" with "rapid bus". The text accompanying the graphic also already qualifies it noting that it is identifying "common treatments" to compare the difference in level of investment between rapid bus and better bus.	Y
15	O'Brien	Tara	TriMet	Email	8/22/2023	Y	Amend to add "Better Bus" yellow dot to "Transit Signal Priority" and "Street Access Improvements"	Add yellow Better Bus dot to transit signal priority and add new category for "Station Access Improvements" and add Better Bus yellow dot and green rapid bus dot.	Y
16	O'Brien	Tara	TriMet	Email	8/22/2023	Y	Clarify what is meant by "lower tier corridors".	Amend as follows: "In most cases, <del>lower tier corridors</del> in lower tiers (Tiers 3 and 4) do not have sufficient land use, population, and employment density in place to be competitive for increased investment in the short term."	Y
17	O'Brien	Tara	TriMet	Email	8/22/2023	Y	10. Amend second sentence in call-out box as follows: "Additional community priorities are focused on making high capacity transit for <u>faster and more</u> comfortable to use."	Amend as requested.	Y

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18	O'Brien	Tara	TriMet	Email	8/22/2023	Y	Amend as follows: "For transit investments to meet success and be utilized to its fullest potential, <u>when projects are funded through New Starts grants</u> , other elements and improvements around the transit service and infrastructure are needed; <u>projects delivered with Small Starts grants will need to be more focused on transit investments.</u> "	Amend HCT strategy page 49 to add a call-out box as follows: " <u>High capacity transit provides substantial benefits to riders, in the form of increased service, higher capacity vehicles, enhanced amenities, specific branding, and other features. Traditionally, these types of investments have included important and also substantial corridor-wide investments in cycling and walking facilities, lighting and safety enhancements, and overall infrastructure upgrades (e.g., pavement, sidewalk replacement, stormwater, signals). While these provide a greatly-improved corridor when complete, these projects are very costly (at and often beyond the funding limits of a Small Starts or New Starts grant) and some corridor upgrades can be tangential to the purpose and need of the core transit project investments.</u> These trade-offs and considerations are not unique to greater Portland. Other regions and agencies nationally have grappled with the same opportunities and challenges and pursued innovative and/or more nimble, flexible and less costly approaches to implementing a rapid bus network. Examples include pursuing projects more focused on transit investments (within the funding limits of a Small Starts grant) and or engaging in planning a rapid bus system that allows more corridors to move through project development at the same time. The 2023 Regional Transportation Plan outlines future work on a Bus Rapid Transit Implementation Plan that will advance the High Capacity Transit Strategy to consider how to best apply these types of strategies and implement Frequent Express investments within the framework of the high capacity transit vision to serve our region's goals."	Y
19	O'Brien	Tara	TriMet	Email	8/22/2023	Y	Add table title and text below table: <u>These elements are scalable depending on the level of investments in the corridor.</u>	Amend as follows to add the following figure title: "Figure 18. Transit-supportive element details" and reconcile the following figure numbers. No change recommended to the table text- the introductory sentence for this table notes that these are all the things that can be considered as strategies through the corridor planning process.	Y
20	O'Brien	Tara	TriMet	Email	8/22/2023	Y	Amend as follows: "The role of community engagement... These events cement residents' ownership of the narrative surrounding their communities and the changes they wish to see. [New paragraph] These practices generally apply to larger projects with exclusive transit guideways. Smaller-scale projects will feature engagement strategies tailored to the level of investment.""	No change recommended. Community engagment strategies identifying and addressing key community needs are a critical part of transit project planning and meant to be done in partnership so that this responsibility is not solely the transit agency's responsibility.	Y
21	O'Brien	Tara	TriMet	Email	8/22/2023	Y	Amend as follows: " <u>For larger projects with exclusive transit guideways</u> , developing station area plans are an early action in corridor development that help tailor local zoning codes and policies to the local context and community-supported vision."	Amend HCT strategy page 49 to add a call-out box as follows: " <u>High capacity transit provides substantial benefits to riders, in the form of increased service, higher capacity vehicles, enhanced amenities, specific branding, and other features. Traditionally, these types of investments have included important and also substantial corridor-wide investments in cycling and walking facilities, lighting and safety enhancements, and overall infrastructure upgrades (e.g., pavement, sidewalk replacement, stormwater, signals). While these provide a greatly-improved corridor when complete, these projects are very costly (at and often beyond the funding limits of a New Starts grant) and some corridor upgrades can be tangential to the purpose and need of the core high capacity investments.</u>	Y



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								These trade-offs and considerations are not unique to greater Portland. Other regions and agencies nationally have grappled with the same opportunities and challenges and pursued innovative and/or more nimble, flexible and less costly approaches to implementing a rapid bus network. Examples include pursuing projects more focused on transit investments (within the funding limits of a Small Starts grant) and or engaging in planning a rapid bus system that allows more corridors to move through project development at the same time. The 2023 Regional Transportation Plan outlines future work on a Bus Rapid Transit Implementation Plan that will advance the High Capacity Transit Strategy to consider how these types of strategies could be applied and the role they could play as part of a broader approach for implementing Frequent Express investments within the framework of the high capacity transit vision to serve our region's goals."	
22	O'Brien	Tara	TriMet	Email	8/22/2023	Y	Amend as follows: "Commitment to corridor: <u>larger projects with exclusive transit guideways</u> delivers economic potential to entire corridors, and local jurisdictions should be ready..."	Amend HCT strategy page 49 to add a call-out box as follows: "High capacity transit provides substantial benefits to riders, in the form of increased service, higher capacity vehicles, enhanced amenities, specific branding, and other features. Traditionally, these types of investments have included important and also substantial corridor-wide investments in cycling and walking facilities, lighting and safety enhancements, and overall infrastructure upgrades (e.g., pavement, sidewalk replacement, stormwater, signals). While these provide a greatly-improved corridor when complete, these projects are very costly (at and often beyond the funding limits of a New Starts grant) and some corridor upgrades can be tangential to the purpose and need of the core high capacity investments.  These trade-offs and considerations are not unique to greater Portland. Other regions and agencies nationally have grappled with the same opportunities and challenges and pursued innovative and/or more nimble, flexible and less costly approaches to implementing a rapid bus network. Examples include pursuing projects more focused on transit investments (within the funding limits of a Small Starts grant) and or engaging in planning a rapid bus system that allows more corridors to move through project development at the same time. The 2023 Regional Transportation Plan outlines future work on a Bus Rapid Transit Implementation Plan that will advance the High Capacity Transit Strategy to consider how these types of strategies could be applied and the role they could play as part of a broader approach for implementing Frequent Express investments within the framework of the high capacity transit vision to serve our region's goals."	Y

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23	O'Brien	Tara	TriMet	Email	8/22/2023	Y	Amend as follows: “However, <u>large-scale</u> HCT investments can incentivize redevelopment of property along project corridors and have historically been one of several contributors to ongoing land value and rent increases.”	Amend HCT strategy page 49 to add a call-out box as follows: " <u>High capacity transit provides substantial benefits to riders, in the form of increased service, higher capacity vehicles, enhanced amenities, specific branding, and other features. Traditionally, these types of investments have included important and also substantial corridor-wide investments in cycling and walking facilities, lighting and safety enhancements, and overall infrastructure upgrades (e.g., pavement, sidewalk replacement, stormwater, signals). While these provide a greatly-improved corridor when complete, these projects are very costly (at and often beyond the funding limits of a New Starts grant) and some corridor upgrades can be tangential to the purpose and need of the core high capacity investments.</u>	Y
24	O'Brien	Tara	TriMet	Email	8/22/2023	Y	Amend the first sentence of the first section as follows: “ <u>For larger projects with exclusive transit guideways</u> , creating an equitable development framework that guides all land use and development planning in a project corridor helps a community evaluate its guiding principles to ensure that equity is an ongoing part of the planning and development conversation, and includes affordable housing and anti-displacement strategies.	No change recommended. Equitable development strategies identifying and addressing key community needs are a critical part of transit project planning and meant to be done and implemented in partnership so that this responsibility is not solely the transit agency's or transit project's responsibility. Part of this work is outlining where those opportunities and roles lie.	Y
25	O'Brien	Tara	TriMet	Email	8/22/2023	Y	Amend the first section as follows: “This means investing in the streetscape around transit station areas, completing pedestrian and bicycle networks <del>and</del> to HCT stations, and partnering with mobility service providers to ensure people can safely reach HCT services. <u>The level of investment will vary by project and corridor.</u> ”	Amend as follows: “This means investing in the streetscape around transit station areas, completing pedestrian and bicycle networks <del>and</del> to HCT stations, and partnering with mobility service providers to ensure people can safely reach HCT services. <u>Since HCT projects in the region are context sensitive, the level and types of investment are likely vary by project and corridor.</u> ”	Y
26	O'Brien	Tara	TriMet	Email	8/22/2023	Y	Amend third bullet under the second paragraph in the Federal Funding and Eligibility section as follows: “include features such as traffic signal priority for buses, <del>off-board fare collection, park and ride facilities, etc.</del> ”	Amend as requested.	Y
27	O'Brien	Tara	TriMet	Email	8/22/2023	N	No change proposed. Expressed appreciation for including a point about opportunities vs challenges in lessons learned from early regional rapid bus implementation.	No change recommended.	N

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28	Ottenad	Mark	City of Wilsonville	Email	7/21/23	Y	Amend the HCT Strategy to include and prioritize the WES extension to Salem.	No change recommended. The extension of commuter rail to Salem is included in the 2023 Regional Transportation Plan Transit Network Vision (as shown on the map on page 3-106 the dark pink line for commuter rail extends beyond Wilsonville into Marion County). However, while commuter rail is a high capacity transit mode this connection is actually classified as inter-city rail which is a distinct classification under a separate policy (Policy 8 on page 3-117). That is because it is a connection that extends beyond Metro’s planning boundary, making it inter-city rail (like Amtrak) which is also guided by the Oregon State Rail Plan due to the State’s role in inter-city rail service planning, especially along the entire Portland to Eugene corridor (and the additional considerations that come into play with that like balancing passenger and freight rail needs). As far as priority within the inter-city network, the 2023 RTP does note in Chaper 3 under transit policy 8 on page 3-117: “When developing inter-regional rail service, this corridor alignment [WES extension] should take priority for improving passenger rail service between Eugene and Portland in the nearer-term future.”	N
29	Rosenthal	Gerritt	Metro Councilor	Email	8/21/2023	Y	The figure used to present the general vision (p 6) is evocative but also is a bit too general to clarify the concepts for our area. Two items of note are these: (1) we do not clarify either how we identify “regional centers” compared to “town centers” nor (2) do we identify the “regional centers” that are critical in our area. To that point, we clearly have a “central city” in Portland, but it is important to note that we now have at least three regional centers, i.e. Vancouver, Beaverton, and Hillsboro. It is unclear (perhaps arguable) whether the West Linn-Gladstone-Oregon City area is a “town center” or a “regional center” and the same can be said of Gresham-Troutdale and also the Wilsonville-Tualatin-Sherwood job triangle.	Amend the HCT Strategy to hyperlink Figure 1 to the latest 2040 Growth Concept online interactive map. Figure 1 on page 6 of the High Capacity Transit Strategy is the vision map and growth concept from <i>The Nature of 2040</i> that describes the urban design concepts in more detail developed as part of a collaborative region-wide process and with the aspirations this concept supports described in <i>Our Place in the World</i> (both available on Metro's website). As such, this map is an excerpt included in the HCT strategy (which also informed development of the strategy in considering future land use growth) but developed through a different planning effort and maintained through a different process. Though it is difficult to see in the HCT Strategy at the report scale and given the slight differences in shade used in the symbology, the differences are clear in the full size map online. Gresham, Gateway, Clackamas Town Center, Oregon City, Washington Square, Beaverton, Tanasbourne/AmberGlen and Hillsboro are all regional centers while the other areas shown in lighter purple (including Troutdale, Wilsonville, Tualatin and Sherwood among others) are town centers. Local jurisdictions have the discretion to propose redesignating and/or identifying new centers which are subject to differing requirements outlined in Metro's Regional Functional Plan and implementing documents (Urban Growth Management Functional Plan and Regional Transportation Functional Plan). Additionally, Chapter 8 of the RTP does identify future work on the 2040 refresh and this comment has been forwarded to staff working on the update.	Y
30	Rosenthal	Gerritt	Metro Councilor	Email	8/21/2023	Y	It is notable that the “Prioritized Investment” figure shows key commercial “activity” centers such as Tanasbourne/Amber Glen or Washibgton Square, but these “activity” centers are not conceptualized on the HCT Vision figure. It seems unclear whether they are what we define as “regional centers” or a category intermediate between “town centers” and “regional centers”.	Amend Figure 16 to add symbology to the legend identifying the regional and town center bubbles shown on the map.	Y



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31	Rosenthal	Gerritt	Metro Councilor	Email	8/21/2023	N	One further note is that this schematic identifies what looks like a “ring” connection of radial spokes to the regional centers, whereas our current planning vision stops short of that goal. If these newer areas are to be considered “regional centers”, then a longer term vision would seem to suggest a more complete “ring” system.	No change proposed. The first HCT Plan for light rail envisioned a more "hub and spoke" network connecting regional centers to the central city which has been largely completed (with the exception of extensions to Oregon City and Vancouver). This updated HCT strategy uses rapid bus as a tool for envisioning new connections of regional centers and town centers to expand the network.	N
32	Rosenthal	Gerritt	Metro Councilor	Email	8/21/2023	Y	The whole concept of HCT utility hinges on the identification of critical corridors. For individual travel, corridors fall into three categories: Interregional, intraregional, and local. In addition freight and commerce are other critical corridor functions. Commerce implies local business and service as opposed to interregional freight hauling. The key feature of RTP corridors is the “intraregional” aspect. All corridors of import for the RTP will have an “intraregional” function but will vary as to other functions, e.g. OR 43 is of marginal “local” and “interregional” function and essentially no “freight” value. HCT corridors are a subset of “intraregional” corridors and are those whose dominant function is for “intraregional and local” conveyance. A complete listing of all critical RTP corridors would make it easier to see how the HCT corridors fall into the overall RTP picture. As an example, Marine Drive is a critical corridor but is primarily “freight”, and so is not an HCT consideration. Hwy 26 is primarily “interregional” and so only portions of it qualify for HCT due to limited “local” access.	No change recommended. Metro's Atlas of Mobility Corridors: User Guide summarizes the different mobility functions of key regional corridors for moving cars via limited access freeways or less limited access highways, people riding transit and in need of a future high capacity solution, people riding bikes and walking and in need of a connecting trail and also freight goods. Not all corridors serve all functions. This information also informed the High Capacity Transit Strategy. Additionally, local access was a consideration in the assessment criteria for evaluating corridors and one of the reasons the transit solutions are context sensitive (looking different from one corridor to another).	N
33	Rosenthal	Gerritt	Metro Councilor	Email	8/21/2023	Y	1) It seems impractical to show corridors such as C20 as single corridors since it is unlikely there are large number of “thru” riders on this route (i.e. St. Johns to Milwaukie)...it would seem more practical to list as two connected corridors, e.g. C20A and C20B	No change recommended. Corridor C20 (St. Johns to Milwaukie via Cesar Chavez) is a longer corridor and we know given the funding cap associated with New Starts that segmentation will be a consideration, similar to other recent planning efforts. However, this would be considered in developing the project as part of the locally-preferred alternative and its implementing design undertaken as part of the corridor planning process.	N
34	Rosenthal	Gerritt	Metro Councilor	Email	8/21/2023	Y	2) The short “vision corridor” from Beaverton to Washington Square is not labeled.	No change recommended. Corridor C3 (Beaverton to Wilsonville in the vicinity of WES) spans from Beaverton to Wilsonville. This corridor has three potential options for a High Capacity Transit solution: upgrading the Line 76 to rapid bus, improvements to increase WES frequency and service, or extension of light rail. Segmentation may be a consideration for the rapid bus or light rail solutions. Both the mode and alignment extent would be considered in developing the project as part of the locally-preferred alternative and its implementing design undertaken as part of the corridor planning process.	N
35	Rosenthal	Gerritt	Metro Councilor	Email	8/21/2023	Y	Corridor C-4 implies a new bridge over the Willamette River, a concept that has not been formally presented, and in fact, this C-4 is really 3 corridors: Clackamas to Milwaukie, Milwaukie to Lake Oswego, and Lake Oswego to Tigard/Beaverton, the point being that each of these will likely serve different riderships.	No change recommended. Corridor C4 follows the existing railroad bridge which presents a potential future rail crossing opportunity. The alignment extent and/or segmentation would be considered in developing the project as part of the locally-preferred alternative and its implementing design undertaken as part of the corridor planning process.	N

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36	Rosenthal	Gerritt	Metro Councilor	Email	8/21/2023	Y	Lake Oswego to Tualatin is an important corridor (Boones Ferry) and is not shown...this could arguably be an HCT.	No change recommended. The High Capacity Transit Strategy policy framework builds from the 2040 Growth Concept corridors to identify major travelsheds and then identify among those planned for future frequent transit, which show need to be taken to the next level. The Lake Oswego to Tualatin corridor is not one identified in these plans as a major regional travel corridor as demand has not yet reached that level. However, high capacity transit is planned on the mobility corridors/major arterials identified from Lake Oswego to Tigard (C4) and then Tigard to Tualatin (C3) to create this connection. The work done by the 2040 refresh will take a fresh look at major mobility corridors and then the 2028 RTP update will incorporate any related adjustments in consideration with the Access to Transit study work as well.	N
37	Rosenthal	Gerritt	Metro Councilor	Email	8/21/2023	Y	C-6 is really 2 disparate corridors with the inflection at Tualatin/Lake Grove.	No change recommended. While Corridor C6 (Beaverton - Tigard - Lake Oswego - Milwaukie - Clackamas Town Center) is long, the alignment extent and/or segmentation would be considered in developing the project as part of the locally-preferred alternative and its implementing design undertaken as part of the corridor planning process.	N
38	Rosenthal	Gerritt	Metro Councilor	Email	8/21/2023	Y	Why is Damascus shown and without any connectivity? For completeness other non-Metro jurisdictions might be shown (e.g. North Plains, Canby, Sandy).	No change recommended. Many of these connections would actually be classified as inter-city rail which is a distinct classification under a separate classification in the transit network/spectrum and guided by a different policy (Policy 8 on page 3-117). That is because they extend beyond Metro's planning boundary, making it inter-city rail (like Amtrak) which is also guided by the Oregon State Rail Plan due to the State's role in inter-city rail service planning, especially along the entire Portland to Eugene corridor (and the additional considerations that come into play with that like balancing passenger and freight rail needs). While the 2009 High Capacity Transit Plan included a corridor further to the east connecting to Damascus, this was moved west to align with the Clackamas to Columbia corridor in the 2018 Regional Transit Strategy. The High Capacity Transit takes frequent bus to the next level and Damascus is not currently envisioned for frequent service in the future based on its character. Rather, the Access to Transit Study will consider whether first/last mile transit solutions to Happy Valley are a better fit.	N
39	Rosenthal	Gerritt	Metro Councilor	Email	8/21/2023	N	Tualatin-Sherwood is a critical corridor for commerce and freight, though not for HCT purposes, but with job expansions might become one.	No change recommended. The Tualatin-Sherwood corridor is a mobility corridor in the atlas identified for freight and highway functions. This comment is also noted for future work.	N

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40	Rosenthal	Gerritt	Metro Councilor	Email	8/21/2023	Y	Concerned that C2 (OR 99W) remains a tier 4.OR 99W serves all functions: local, inter, intra, commerce and freight.	No change recommended. In addition to WCCC and WCCC TAC, we worked closely with a working group on all of the milestones for the strategy which included representation from Washington County. Guided by the policy framework, we worked with that group of partners to develop criteria and an approach for reimagining a stronger, expanded system best serving growing and changing regional needs that: o forwards regional goals and investment priorities within the 2018 RTP HCT Readiness and Assessment criteria (previewed at the summer meetings); o maintains consistency with the Federal Transit Administration’s Capital Investment Grant Program project justification criteria to tie to funding historically critical to implementation success; o reflects the greater Portland region’s history of success with and capacity to engage in the Federal Project Development process (advancing one corridor every three years); and o considers investments within the RTP horizon (at a reasonable scale, <20 corridors in 2009 High Capacity Transit Plan and 2018 Regional Transit Strategy) and beyond. The tier buckets then reflect the corridors that demonstrate the most needs near-term, best meet regional goal outcomes, and have the greatest competitiveness for federal funding, limited to a reasonable number based on timelines tied to and our historical regional capacity for advancing corridors. Since we developed that criteria and its guiding policy framework closely with partners, we’re relying on its technical results to establish the tiers with room for technical adjustments. So it is a different process than establishing corridors of regional priority like the funding measure did for instance, although that framework did influence the overall vision. The Highway 99W corridor is showing both land use and employment demand, however only at the level of over 11,000 potential transit attractions in 2040 (compared to hundred thousangs for many Tier 2 corridors). Work during the transportation funding measure also identified some key corridor needs to give us a head start. But there is a lot of work to do in promoting high density land use and then time for the market to respond in implementing that and other key destinations, even considering out of region trips which in whole for this area are only about 10,000 more (not necessarily transit attractions for this corridor). This corridor also is not serving a higher proportion of regional equity focus areas in line with our goals. Travel times here are also relatively good compared to other areas of the region. Again, even when considering inter-regional trips, this corridor is not yet showing the readiness for high capacity investment indicative of a Tier 2 designation. However, one key point is that the High Capacity Transit Strategy provides a pipeline prioritizing these types of transit investments by corridor. It does not apply to all transportation investments on the corridor or limit other corridor planning activities like the broader Westside Multimodal Improvements Study focused on Highway 26.	N
41	Rosenthal	Gerritt	Metro Councilor	Email	8/21/2023	Y	No “vision” corridor is shown for the Sherwood/King City/ Murray-Scholls/Hillsboro corridor...a corridor with substantial development planned. Current plans are for up to 10,000 new homes along this corridor.	No change recommended. The High Capacity Transit Strategy policy framework builds from the 2040 Growth Concept corridors to identify major travelsheds and then identify among those planned for future frequent transit, which show need to be taken to the next level. The Hillsboro to Sherwood corridor is not one identified in these plans as a major regional travel corridor, nor is there a continuous major arterial planned north-south as while growth is occuring it is not yet at that level of need. However, high capacity transit is planned on the mobility corridors/major arterials identified from Hillsboro to Beaverton (TV Highway) and then Beaverton to Tigard (WES/Hall Blvd) and Tigard to Sherwood (Hwy 99). The work done by the 2040 refresh will take a fresh look at major mobility corridors and then the 2028 RTP update will incorporate any related adjustments in consideration with the Access to Transit study work as well.	N
42	Rosenthal	Gerritt	Metro Councilor	Email	8/21/2023	N	C-3 is evocative, but what does “in the vicinity of” imply - WES can become an effective HCT corridor only with the addition of additional trackage options (i.e. a 2nd track).	No change recommended. Corridor C3 (Beaverton to Wilsonville in the vicinity of WES) spans from Beaverton to Wilsonville. This corridor has three potential options for a High Capacity Transit solution: upgrading the Line 76 to rapid bus, improvements to increase WES frequency and service (which do require double tracking), or extension of light rail.	N
43	Rosenthal	Gerritt	Metro Councilor	Email	8/21/2023	N	C-17S is good conceptually, but, under a corridor functionality definition it actually becomes 2 corridors - West Linn to Sellwood Bridge, and a Sellwood Bridge to Downtown corridor.	No change recommended. The alignment extent and/or segmentation for C17S (Oregon City to Downtown Portland via Hwy 43) would be considered in developing the project as part of the locally-preferred alternative and its implementing design undertaken as part of the corridor planning process.	N

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44	Rosenthal	Gerritt	Metro Councilor	Email	8/21/2023	N	C-14 - has anyone done a preliminary penciling out of the cost/benefit of a river tunnel including the potential grade implications? Of more concern is thenimportance of “through” ridership using the Central City concept which would imply that trips out of the central city are dominant. It is hard to believe this is a higher priority than many other projects such as 99W, Sherwood/Murray-Scholls/Hillsboro, or West Linn/Oregon City-Tualatin. Has a “limited stop express” concept been evaluated?	No change recommended. TriMet and Metro staff have explored the feasibility and cost/benefit of the tunnel via the MAX Tunnel Study. While the tunnel would reduce the number of stops downtown, it would still retain some subway-style stops in the central city. This was consistently the top community priority expressed in reply to surveys and tabling activities by people throughout the region. While speed is a key benefit, one of the main problems that the tunnel is a solution for is limited capacity for trains on the Steel Bridge that will not allow for the number of trains needed in the future to keep pace with anticipated growth. While express trains have some speed benefit, capacity on the Steel Bridge is still a limiting factor. Additional work to study the tunnel and Steel Bridge capacity is also included in Chapter 8 Section 8.2.3.4 Steel Bridge Transit Bottleneck Study.	N
45	Rosenthal	Gerritt	Metro Councilor	Email	8/21/2023	N	C23 would seem to be 2 distinct corridors- 155th and Farmington Road.	No change recommended. The alignment extent and/or segmentation for C23 (Bethany to Beaverton via Farmington/SW 185th) would be considered in developing the project as part of the locally-preferred alternative and its implementing design undertaken as part of the corridor planning process.	N
46	Rosenthal	Gerritt	Metro Councilor	Email	8/21/2023	Y	Given recent plans by SMART to supplement C-3 and C-6; it would seem a corridor along I-5 might be conceptualized.	No change recommended Corridor C3 (Beaverton to Wilsonville in the vicinity of WES) is representative and not a final alignment. The representative alignment follows WES- the infrastructure existing today- but the HCT solution could be upgrading the Line 76 to rapid bus, improvements to increase WES frequency and service (which do require double tracking), or extension of light rail. Those options would all be slightly different routes between Beaverton and Wilsonville and could include an alignmen paralell to I-5.	N
47	Rosenthal	Gerritt	Metro Councilor	Email	8/21/2023	N	C22S seems odd in that C-29 already exists...is this really higher priority than C-2 (Hwy99W) or C26?	No change recommended. In line with the High Capacity Transit Strategy policy framework Corridor C22S PCC Sylvania to Downtown Portland via Capitol Hwy provides a more direct connection to the college campus and is an alternative to the shuttle connections planned as part of Southwest Corridor. Even with Southwest Corridor, due to the school the demand projected for this corridor is high and higher than Tier 3 and 4 corridors. Additionally, there is already a bus priority lane pilot along this corridor. This connection does need further study along with Southwest Corridor as far as feasibility and phasing and will be reconsidered with regional discussion again in the 2028 Regional Transportation Plan.	N
48	Rosenthal	Gerritt	Metro Councilor	Email	8/21/2023	N	It is notable that PDX is not shown, although Washington Square and Clackamas TC are shown. Although we already have MAX to PDX, in the future, HCT connection to regional rail, perhaps in Oregon City, might be a useful concept and better connectivity to Clark County might be important	No change recommended. PDX airport was considered along with other major employers and job centers, as well as medical centers and affordable housing when developing the High Capacity Transit Strategy vision and prioritized pipeline. Rather than show all of these, the vision map focuses on centers which are the key element guiding the network concept in the policy framework. The full transit network map in the 2023 RTP does show employment areas and air terminals as well.	N
49	Rosenthal	Gerritt	Metro Councilor	Email	8/21/2023	Y	I also wonder whether we should consider, in some other category, some of the other connections such as North Plains to Hillsboro, Newberg to Sherwood, Canby to Oregon City, Woodburn to Wilsonville/Tualatin, and Damascus to Clackamas. Because Vancouver has become an important “regional center” some further discussion might be useful on the connections between the two HCT systems.	No change recommended. Many of these connections would actually be classified as inter-city rail which is a distinct classification under a separate classification in the transit network/spectrum and guided by a different policy (Policy 8 on page 3-117). That is because they extend beyond Metro’s planning boundary, making it inter-city rail (like Amtrak) which is also guided by the Oregon State Rail Plan due to the State’s role in inter-city rail service planning, especially along the entire Portland to Eugene corridor (and the additional considerations that come into play with that like balancing passenger and freight rail needs).	N

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								<p>While the 2009 High Capacity Transit Plan included a corridor further to the east connecting to Damascus, this was moved west to align with the Clackamas to Columbia corridor in the 2018 Regional Transit Strategy. The High Capacity Transit takes frequent bus to the next level and Damascus is not currently envisioned for frequent service in the future based on its character. Rather, the Access to Transit Study will consider whether first/last mile transit solutions to Happy Valley are a better fit.</p> <p>Two connections to Vancouver's growing rapid bus system (Mill Plain, 4th Plain, Hwy 99) are envisioned in the strategy: 1) an extension of the yellow line downtown (planning underway with Interstate Brige Project) and 2) a connection across I-205 (anticipated to connect but shown conceptually to not yet assume a connection point as C-TRAN continues to plan and build the network).</p>	
50	Rosenthal	Gerritt	Metro Councilor	Email	8/21/2023	Y	Add a short section devoted to explaining that HCT is a critical, but not the only, element in the system, and that transit connectivity, i.e. “reaching many interconnected destinations” and “last mile connections” are also part of the overall system and supplemental to the HCT system.	Amend page 29 of the High Capacity Transit Strategy following Figure 13 as follows: " <u>As illustr</u>	N
51	Shepley	David	Community member	Online Comment Form	7/22/2023	N	No change proposed. Expressed support for corridor C17S Oregon City to Downtown Portland via Hwy 43 within the High Capacity Transit Strategy network vision.	No change recommended. Corridor C17S is included in the HCT Strategy vision.	N
52	Fitzgerald	Marianne	Crestwood Neighborhood Association	Letter	8/9/2023	N	No change proposed. Expressed support keeping the Southwest Corridor Light Rail Plan in Tier 1. We shared many comments with Metro while this plan was being developed, and hope Metro will fund station access projects such as the sidewalks and bike paths on SW Taylors Ferry Road in the near future.	No change proposed. Comment noted.	N
53	Holmqvist	Ally	Metro Staff		8/8/23	Y	Amend Appendix A to add the High Capacity Transit Community Vision Survey Summary and OPAL Community Survey Results. These summaries were not yet available at the time the HCT Strategy Public Review Draft was released.	Amend as requested. The outreach summarized informed development of the HCT Strategy Public Review Draft and the Engagement summary and these documents are now available to attach for documentation of additional detail.	Y
54			HCT Strategy Working Group	Working Group Meeting #7	7/17/2023	Y	Amend Appendix F of the HCT Strategy to update the corridor titles and descriptions to add the corresponding corridor map ID and identify the locations of planned and implemented transit priority lanes (including Rose Lane projects). Make additional technical corrections as needed.	Amend as requested.	Y



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55	Lindstrom	Andrew	Brooklyn Action Corps Land Use And Transportation Committee	Online Comment Form	8/18/2023	Y	Requests additional clarification on the definition of "high capacity" transit, including a quantitative definition of the number of passengers such transit can move per hour.	No change recommended. There is a definition of high capacity transit on page G-16 of the 2023 Regional Transportation Plan Glossary that provides more information on the capacity level by mode. Additionally, Figure 3-28 on page 3-109 provides relative information on level of capacity by high capacity transit mode and the supportive density required. Further, the description under Transit Policy 7 on page 3-115 provides more information on the elements that make transit high capacity which include a mix of vehicle size, frequency, service span, roadway priority and station and vehicle efficiency improvements. These are also described in more detail in the High Capacity Transit Strategy which also notes while streetcar and commuter rail contain many of these elements, there are additional improvements needed to make these modes truly high capacity (e.g., frequency, span, speed). Together, this framework identifies that to be high capacity in its highest form, transit must have a larger vehicle than a standard bus to hold more people, strive for better frequencies than 15 minutes (ideally 10 or less), have a schedule operating most of the day (no not just people throughput per hour but per day), have as much priority as possible (ideally fully dedicated space to run) and more efficient, comfortable, convenient stations. While together this is the goal, there is some flexibility to allow for context-sensitive implementation and flexibility for retrofits, particularly within the different definitions established by the Federal Transit Administration.	N
56	Perez	Judith	Southwest Washington RTC	Letter	8/25/2023	N	Requests that ongoing coordination occur between the Gateway to Clark County project identified in the High Capacity Transit strategy and planned transit strategy updates in Clark County.	No change recommended. Ongoing bi-state coordination will occur as the High Capacity Transit Strategy is implemented following the adoption of the 2023 RTP and as part of future RTP updates and updates to the Clark County High Capacity Transit Strategy.	N