



Wendie L. Kellington
P.O. Box 2209
Lake Oswego Or
97035

Phone (503) 636-0069
Mobile (503) 804-0535
Email: wk@klgpc.com

September 22, 2025

Via Electronic Mail
Board of Directors
82nd Ave Business Association

RE: Tri-Met High Capacity Transit Corridor

Dear Members of the Board

We worked together when I served as Washman's representative to the Board a year or so ago. I hope you are well. As you may remember, when we were on the Board together, we were dealing with City of Portland median issues. Now, 82nd Ave is threatened with a serious problem again and Washman seeks your help. This time the issue is that Tri-Met is proposing to convert 82nd to a "high-capacity transit corridor" or "HTC" with changes to 82nd Ave. that are untenable, unsafe, and will cause extreme hardship to businesses in the corridor that can survive, which won't be many. Please understand that in concept, Washman (and Fubon who joins Washman's concerns), don't mind the HTC. In fact, both did not object to the "Local Preferred Alternative" which they were told was limited to:

- Consolidation of stations
- Modifying the signal lights to give preference to buses
- New stations that provide shelter and meet ADA requirements for ease of use

Those changes would improve transit traffic and would not cause too much disruption to vehicle traffic in our trade commerce corridor. But that is not what Tri-Met is proposing.

Instead, what is on the table now is an extreme proposal and the voice of business is simply not being heard. Now, the proposal is that two entire lanes of 82nd Ave (both northbound and southbound), will be closed to motor vehicles and that "bus lanes" will take their place, dedicated to 4-5 buses every hour, creating serious additional congestion – taking away 50% of 82nd Ave.'s capacity to speed up transit times by an just a few minutes, but causing the same or worse corresponding delays for motor vehicle traffic. Looking at this another way, of the 21,870 vehicles recorded on a single day in November 2021, 190 of them were busses. Thus, busses represent less than 1% of the vehicles traveling on 82nd Ave. But Tri-Met proposes to allocate half of 82nd Avenues lane capacity to that 1% of the vehicle traffic and is adding serious impediments to the 99% of vehicles trying to get to 82nd Ave. business destinations. The 99% who are frustrated with increased travel times and being stuck in traffic will be left to wonder why they are unable to use the empty bus-only lanes. And looking for local street options to avoid that congestion.

Further, according to Tri-Met's poster boards (presented at their open-house at PCC on April 23, 2025), installing continuous BAT lanes along the entire 7-mile corridor would save buses

some number of minutes, but will delay all other motor vehicle traffic on the corridor at least an equivalent amount. This means the total delay to vehicles travelling along the corridor is projected to *increase* as a result of the significant public investment in this infrastructure. So, sure, 195 buses each get to their destination a few minutes faster, but (according to Tri-Met) 5,000 vehicles move away from 82nd Avenue entirely due to congestion (and make a mess of neighborhood streets) and the 17,000 vehicles per day that remain on 82nd Avenue, deal with equivalent or worse delays compared to the time saving of 195 busses. Tri-Met says that its plan saves buses a total of 11.5 hours of vehicle delay per day, but acknowledges that it adds at least 1,000 hours of delay per day for all other vehicle traffic. We haven't seen any projections from TriMet regarding how many riders might be added with the BAT lanes, but if the 5,000 vehicles per day Tri-Met says will be displaced from 82nd Ave., to other streets under their plan, carried 1.4 people each, that is 7,000 fewer people that can travel on 82nd Avenue per day. Even assuming that bus ridership increases along the corridor with BAT lanes, the proposed plan represents a significant investment of public taxpayer money that actually moves fewer people, and with higher total traffic delay, to the extreme detriment of 82nd Ave businesses that depend on 82nd Ave. Moreover, no one disputes that its not possible to widen 82nd avenue – which makes the idea of dedicated bus lanes on 82nd Ave. simply a non-starter. Other communities that have successfully added bus lanes have done so as an addition to an existing street – not taking the city's busiest street composed for four lanes and converting it to a two lane nightmare.

Equally important are other abysmal proposals to implement the HTC – the 30% design plan is dangerous and poses an existential threat to 82nd Ave businesses – to include Washman and Fubon. They are proposing to move existing bus stops from places where they do not disrupt driveways to areas that very much do disrupt business driveways, for no purpose other than to meet some theoretically perfect bus stop separation distance – notwithstanding that moving a working stop to the proposed new locations will block traffic turning in and out of businesses and foreclose reasonable and safe access to existing businesses AND notwithstanding the fact that there is no functional reason that the stops cannot stay put or move to less disastrous locations – the HTC will still work as intended if Tri-Met merely makes modest adjustments that would avoid destroying 82nd Ave businesses.

It is undisputable that the proposal will significantly and, by design, increase traffic congestion and travel time for people to get to destinations on 82nd Ave. We know you understand that businesses base decisions to stay open or shutter, on traffic studies, a major component of which is the amount of vehicles that move through the road. Cutting vehicle capacity by 50% will make a lot of businesses, now and in the future, not pencil. That will mean fewer businesses in the corridor. With a lower vehicle count, the value of the surrounding properties will decrease because the income generation of the properties will decrease. This will lower the tax base for the city and cause more business flight. Moreover, please understand that 82nd Ave is home to many BIPOC owned businesses owners who have invested their wealth and resources in their business. The proposed changes to 82nd Ave will adversely affect the financial stability of those entrepreneurs and will force BIPOC community members and other businesses out. Such displacement is strongly opposed by the city and federal funders and as a foreseeable outcome of Tri-Met's proposal. The current proposal should simply be a nonstarter.

Tri-Met proposes to partially block driveways and create line of sight obstructions such that, when cars finally get a chance to pull into traffic there will be at some point a serious injury collision between said motor vehicle accelerating to get out of a business and the bike or pedestrian traffic on the other side that no one could see, because of the bus.

There is no plausible reason why Tri-Met will not simply improve the bus stops where they are or, if their heart is set on moving them why Tri-Met does not propose simply adjusting the locations of the new bus stops a hundred feet or so away from Washman driveways and the access streets at both Washman's Raymond and Lindy stores. But Tri-Met does not seem to have much interest in protecting 82nd Ave businesses- which is obvious since Washman raised the same issues with Tri-Met's 15% plans and yet Tri-Met's 30% plans look the same.

As noted, Fubon has similar concerns. In fact, any business along 82nd Ave is likely to have similar issues if they study and understand the proposal. Tri-Met's proposal is an existential threat to 82nd Ave businesses, plain and simple and they must fight it as such. We look to our business organizations to stand with us and hope you will do so. Please let us know how we can best and swiftly work with the 82nd Ave Business Association to get its support objecting to the proposal. This is time sensitive. We look forward to hearing from you.

Very truly yours,



Wendie L. Kellington

WLK:wlk

CC: Mark Hanna
David Tarlow
Michael Liu
Mike Ard