

Submitted by Margaret Tweet, resident in Camas, WA 98607

**In 2012, voters in every city in Clark County and limited county areas permitted to vote REJECTED the C-Tran ballot proposition to extend Oregon's TriMet Max light rail into Clark County** over a proposed I-5 Bridge Replacement. The entire county pays the sales tax that supports CTRAN, yet the entire county was not permitted to vote on the CTRAN proposition.

**In 2013, Clark County Councilors placed an advisory vote county-wide on the ballot to oppose any Light Rail project in Clark County unless it is first supported by a majority of voters in a county-wide vote of the people. Over 68% of voters approved the measure.** No county-wide advisory vote on Light-rail has been held since.

Today, the Interstate Bridge Replacement (IBR) group insists that Clark County, WA must accept Oregon's incredibly expensive MAX light rail on any I-5 replacement bridge. However, light rail is not required on a replacement bridge or tunnel at all, buses and vans are more affordable transit options;

See April 2022 [Herrera Beutler to I-5 replacement administrator: Southwest Washington has repeatedly rejected light rail, look to other transit options.](#)

"Congresswoman Jaime Herrera Beutler today (April 19) sent a letter to Interstate Bridge Replacement Program Administrator Greg Johnson reiterating Southwest Washington's repeated rejection of light rail and proposing transit alternatives for the I-5 bridge replacement project."

***"As you know, bus and Bus Rapid Transit are alternative forms of mass transit that already serve commuters in this region. BRT would also qualify for federal transit funding, offers more flexibility than a fixed-rail system, and is a viable option for the I-5 project."***

When the Oregon Columbia River Crossing oversight committee met in Oregon in 2011, they asked about the bus alternative instead of light rail.

**"CRC Deputy Director Kris Strickler said cost was a driving force behind presenting five different alternatives in the DEIS, some of which offered bus rapid transit instead of light rail.**

**"At that time, cost was a factor," Strickler said. "It was a driver in the discussion."**

See [Oregon lawmakers say CRC project may be too expensive Issues](#) , 2011

In this 2024 DSEIS, all 7 options listed in Tables 2 & 3 of the Executive Summary include only light rail. There are no lower cost, less land taking Buses or Bus Rapid Transit and van options that do NOT include Lightrail. Lightrail with fixed track below, and overhead electric lines above is vastly more expensive to build, and has consistently required about 25% of the total I-5 Bridge Replacement costs. Overhead lines freeze in winter, and over-heat in summer.

If a vote were held today Clark County wide on spending taxpayer dollars to extend OR MAX lightrail, the majority of voters would likely oppose lightrail again. However, the Vancouver Mayor and some Council members are adamant about avoiding another vote on extending OR MAX light rail into Clark County. Please, do not force light rail on Clark County, WA, against our votes. Both WA and OR can SAVE \$\$, Save jobs-put fewer companies out of business by taking their land and operations. How many jobs would be cancelled by IBR land grabs? Save Homes- put fewer residents out of their homes if Buses and vans are used for public transit on any I-5 bridge replacement.

Per Dec. 10, 2024 CTRAN meeting,

\* LRT 5X or more to operate and maintain than buses. Costs were not detailed, could be higher.

\* I-5 Express Bus Routes were consolidated in Jan 2022 , [#105/105X I-5 Express](#) ridership below 2019 levels. Apparently these are the routes that are tied to demand for light rail on I-5.

\* Regional Routes to MAX and airport #60, #65, and #67 ridership ~66% of 2019 weekday average

\* projections that a 2 car light rail train will run on the proposed MAX extension into Clark County every 6.5 minutes are not supported by historical projections of frequent service that have not happened.

\* TriMet Claims that 25% of costs of light rail can be covered by fares collected, which was doubted by CTRAN staff who stated that these projections are overly optimistic. It is well known that many ride the MAX for free.

(Requested documents from CTRAN for the Dec. 10, 2024 meeting have not been provided yet)

Excessive payments to consultants who push costly Lightrail instead of affordable bus and van transit options were identified when the project was labeled the Columbia River Crossing Project. It's time for another audit of payments to consultants now working under the I-5 Interstate Bridge Replacement label. How many taxpayer dollars have been spent on IBR consultants so far?

#### [Audit: WSDOT wastes a lot of money April 17, 2014](#)

An audit of the Columbia River Crossing project reveals that WSDOT mishandled taxpayer dollars and paid "[excessive profits](#)" to project consultants. The Legislature originally called for the audit after finding that "[\\$137 million of the project's \\$182 million in expenditures consisted of payments to consultants.](#)"

In light of the findings, the audit suggests WSDOT begin to implement many bright—and painfully obvious—cost management solutions. Recommendations include,

- Limit consultant markups to those specified in the contract.
- Pay consultants only once for administrative costs – and only for costs that are fully documented and consistent with FHWA and contract requirements.
- To increase the likelihood of receiving more than one proposal, we recommend WSDOT ensure its solicitations, pre-proposal conference comments, and requests for qualifications consistently describe the full scope of work.

Source: Report at Clark County Today on CTRAN and TriMet ridership data

#### ["National and local transit ridership down significantly feds report" May 7, 2024](#)

(Excerpts from above article submitted as public comment )

Washington state was one of two states where over 20 percent of workers were home-based. Oregon is one of 15 states where 16 percent to 19.9 percent worked from home. "The share of people working from home roughly tripled during the pandemic's initial phase," they report. It increased from 5.7 percent of workers in 2019 to 17.9 percent in 2021, but then declined to 15.2 percent of workers in 2022 as pandemic restrictions came to an end.

Here in the Portland metro area, TriMet data mirrors the national trend of reduced transit ridership. In March 2024, ridership remained 34 percent below pre pandemic levels and about [half its 2012 peak](#). At C-TRAN, ridership was down nearly 37 percent at the end of 2022 compared to pre pandemic ridership. Furthermore, C-TRAN ridership peaked in 1999 at 7.75 million boardings. They had just 3.97 million boardings on their fixed route system in 2022; 49 percent below the peak almost a quarter century ago...

This issue is vitally important to Clark County and Portland metro citizens because the Interstate Bridge Replacement Program (IBR) team members are telling the community that there will be between 26,000 and 33,000 daily transit boardings on the I-5 corridor in 2045. This is likely designed to justify their proposal that \$2 billion be spent on a 3-mile MAX light rail extension into Vancouver as part of their \$7.5 billion proposal.

C-TRAN offers the only transit service over the Columbia River. The agency experienced a 61 percent drop in passenger boardings on its express bus system over the two years of pandemic lockdowns. The agency shared numbers for nine separate routes traveling over the river for the 2019 to 2021 years. In 2019, it had 1.4 million boardings which then declined to 555,000 in 2021..

Express Routes crossing the I-5 Bridge saw an average of just 523 daily boardings in 2022, C-TRAN [shared](#) with Clark County Today. Express Routes crossing the I-205 bridge saw an average of 273 daily boardings. Overall, C-TRAN carried 14.5 people per hour of service across their entire bus network in 2022, according to its [annual report](#).

For the IBR transit projections to be accurate, daily ridership on the I-5 corridor would have to increase fifty-fold to reach their 26,000 number. It would have to increase 63 times to reach the 33,000 number.

“With over one quarter of the \$7.5 billion project being the 3-mile light rail extension, and the price tag of the project scheduled to increase according to Johnson, one might wonder why they don’t consider the cheaper and more flexible alternative of buses. C-TRAN has built two Bus Rapid Transit lines for \$50 million each, a small fraction of the \$2 billion cost of extending light rail. Furthermore, it would eliminate the “new revenues” (aka taxes) TriMet is demanding from both states for the operations and maintenance of the light rail into Clark County.

Nationally and locally, transit ridership remains significantly depressed. As more people work from home, others seek to work in suburbs instead of downtown...

“The Cascade Policy Institute has documented multiple [broken promises by TriMet](#),<sup>\*\*\*</sup> when it comes to the MAX light rail service. Every time they have failed to meet those promised levels of service or passengers being carried...

“With one out of eight people working from home, is there a need for any “high capacity” mass transit over the Columbia River? National and local ridership trends indicate the answer is no.”

**\*“C-TRAN 2022 financial results show decline in operating revenue per passenger”, August 9, 2023**  
<https://www.clarkcountytoday.com/news/c-tran-2022-financial-results-show-improvement/>

Last section of the article:

“Express Routes crossing the I-5 bridge saw an average of 523 daily boardings in 2022.

Express Routes crossing the I-205 bridge saw an average of 273 daily boardings.

Note that these numbers include Express only, as requested, and does not include Regional routes that also cross the Columbia River.”

**\*\*Source** 2022 Annual Comprehensive Financial Report For the Fiscal Year Ending December 31, 2022  
[https://www.c-tran.com/images/CAFR/c-tran\\_2022\\_acfr.pdf](https://www.c-tran.com/images/CAFR/c-tran_2022_acfr.pdf)

**\*\*\*[TriMet’s broken promises on getting people to use transit](#) April 12, 2022**

**Where are the missing 50,000 light rail passengers?**

**(excerpts from article)**

In the past two decades, TriMet has opened four new MAX light rail lines. The Red Line connecting the airport to downtown opened in 2001. The Yellow Line opened in 2004; the Green Line in 2009, and the Orange Line in 2015.

Total MAX ridership peaked a decade ago in 2012 at 35 million originating rides, declining 12 percent to just below 31 million in 2019 before the pandemic. The addition of two new light rail lines failed to stimulate ridership. TriMet officials appear to be on track to be short of their optimistic projections by over 50,000 passengers for just two of those lines.

Travel times are nearly 50 percent longer than TriMet promised citizens. The \$350 million Yellow Line, with its multiple stops in north Portland, travels an average of 14 miles per hour (mph)...

TriMet ridership peaked in 2012 and has been in decline ever since. Metro included this in their 2018 Regional Transportation Plan (RTP), the year a PEMCO survey reported 94 percent of people preferred their cars.

TriMet reports in 2021 the cost per boarding rider on their MAX light rail was \$9.08. The cost per vehicle hour is \$449, whereas the operating cost per hour of a TriMet bus is \$116.

C-TRAN recently slashed their express bus service across the Columbia River as their ridership on seven separate express lines declined to less than 1,000 people daily due to the pandemic. TriMet has reported it will take six years for ridership to return to pre pandemic levels...

### **The Green line problems**

The TriMet Green MAX Line under-performs as well. "Some trips that actually use the Green Line were shifted in the ridership predictions to the artificially fast bus services," was the excuse TriMet officials used in their report to the FTA.

Green Line service was promised at 10 minutes between trains during weekday peak periods and 15 minutes during other times. The project opened with 15-minute intervals throughout the day and 35-minute intervals in the evenings. Service remains at 15-minute headways during much of the day.

When the FTA completed its 2015 "Before and After Study" on the line, there was an average 24,000 daily weekday boarding rides. This was 19 percent below the 30,400 riders that TriMet predicted in their preliminary engineering for the line's opening year.

That number has continued to decrease to just over 16,000 average daily riders in August 2019, making up only 34 percent of the FEIS's predicted ridership levels for 2025. With just over three years to go until 2025, it seems unlikely that the Green Line will attract the additional 30,500 riders needed to hit TriMet's promised level of 46,500 boarding rides.

In 2020, it carried just 7,980. That's a shortage of over 38,000 riders on the Green Line. When added to the 12,000 shortfall on the Yellow Line, TriMet is missing over 50,000 boarding riders.

Unsurprisingly, the line's cost was higher than TriMet originally anticipated. The final price tag of \$576 million was 14 percent greater than the anticipated cost in preliminary engineering, a difference of about \$70 million.

A Feb. 2020 news report indicated TriMet downgraded its estimate of the number of daily passengers the newest Orange line would serve to 37,500, down from 43,000. The lowered number illustrates what a moving target ridership can be. TriMet has struggled to meet projections for the Orange Line, which since 2015 has run between downtown and Milwaukie. They did not meet TriMet's first-year projections by nearly 6,000 riders a day.

The 2020 report shows Orange line ridership at 3,350 weekday riders. That is down over 70 percent from 2019 numbers of 12,160 riders. This would add nearly 40,000 missing riders from when the project was initially sold to the community.

### **Crime increased**

Instead of the promised passengers, light rail brought increased crime to the Clackamas Town Center area. Clackamas County experienced heightened crime in the corridor from 2009-2012 after the Green Line opened and an increase in graffiti around MAX stops, according to a survey by the Oregon High Intensity Drug Trafficking Areas Program sent to the Clackamas County Sheriff.

Last month a man was [shot on the green line](#). Last November a Green Line MAX driver prevented an [attempted stabbing](#) at the Clackamas Town Center stop. The MAX system still saw more violent acts and other major security incidents in 2017 than any year since TriMet began reporting to the FTA in 2008.



TriMet's own crime statistics for 2017, showed 63 reports of aggravated assault against customers, an increase of 43 percent. Reports of simple assault, resulting in minor or no injuries, climbed 81 percent, to 168. Half of those crimes occurred on the MAX system, while about a quarter occurred on buses.

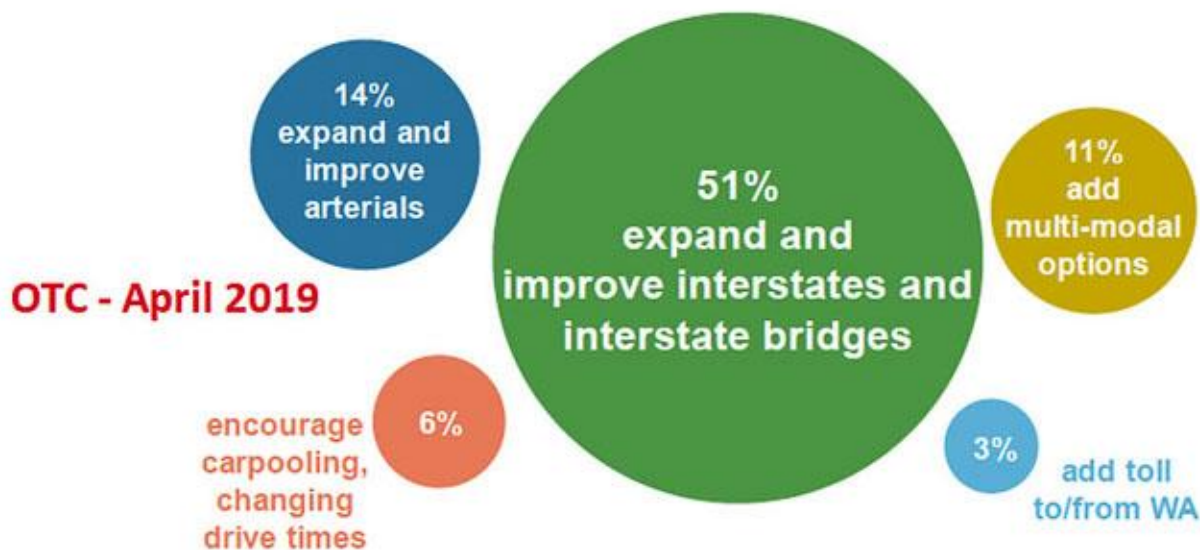
Things have gotten so bad that in January TriMet confirmed that police won't be checking passengers for fares, but instead will be seeking to protect drivers and passengers...

The 2018 PEMCO survey reported 94 percent of people in the Portland area prefer to use their cars. Their private vehicles were faster and more convenient than riding transit. Over half respondents said they wouldn't make any changes and another 15 percent they would drive more often if they could. That was before the pandemic where mass transit experienced 70-80 percent declines in ridership nationally.

Oregon Transportation Commissioner (OTC) Robert Van Brocklin recently said only 4 percent of people in Portland use transit. Other data indicates while some Portland neighborhoods use transit at a much higher rate, the broader metro area transit ridership remains low. Since the IBR is a regional issue, how likely is it that the region will embrace greater transit ridership across the Columbia River?

## Many residents hope congestion can be addressed with additional capacity and new transportation options.

*What would you like officials to do about traffic congestion?*



*The Oregon Transportation Commission 2019 survey results indicate 51 percent of respondents want to expand and improve interstates and interstate bridges to fix traffic congestion. Another 14 percent want to expand and improve arterials. Only 11 percent wanted to expand multi-modal options and 6 percent wanted to change driving times. Graphic courtesy Oregon Transportation Commission*

An April 2019 OTC survey asked "what would you like transportation officials to do about traffic congestion?" The responses indicated 51 percent want to "expand and improve interstates and interstate bridges." Another 14 percent want to "expand and improve arterials." That makes 65 percent of Oregon respondents want to expand vehicle capacity and improve roads to reduce traffic congestion.

The IBR team members appear to be favoring extending the Yellow Line into Vancouver, in spite of data showing few people will ride it. They have said there is "substantial demand" for high-capacity transit, but haven't provided that data. \*\*\*\*\*

## The MAX Yellow Line: A Look Back After 15 Years

<https://cascadepolicy.org/transportation/the-max-yellow-line-a-look-back-after-15-years/>

By Rachel Dawson

TriMet's MAX Yellow Line first opened 15 years ago in May 2004. The Yellow Line's Final Environmental Impact Statement (FEIS) made a myriad of predictions for the year 2020, which makes now the perfect time to reflect on what officials promised and what taxpayers and transit riders have since received.

### Yellow Line History

The Yellow Line originated in 1988 as a 21-mile project connecting Vancouver, Washington with Downtown Portland and Clackamas Town Center. This plan was scrapped after Clark County voters defeated a proposal to raise \$236.5 million in 1995 and Oregon voters turned down a \$475 million regional ballot measure in 1998.

Not to be deterred by a lack of voter support, officials developed a shorter alternative in 1999 that would run from the Expo Center to Downtown Portland along Interstate Avenue. This alternative cost \$350 million, 74% of which came from the Federal Transit Administration (FTA).

The construction of the new alternative was not put to a public vote. Portland officials instead expanded an urban renewal district to include the Interstate Avenue Corridor. Doing so allowed them to appropriate \$30 million in tax increment funds to finance the rail that otherwise would have gone to other tax-collecting jurisdictions, including Multnomah County. The county commissioners opposed expansion of the urban renewal district, but the Portland City Council approved it anyway.

Looking back after fifteen years, we find that key promises made in the FEIS were never kept:

#### 1. Frequency of Service

What We Were Promised: TriMet promised FTA in their Full-Funding Grant Agreement (FFGA) that peak-hour trains would arrive every ten minutes and off-peak trains every 15 minutes. The promised service according to the FEIS was supposed to reach eight trains during peak hours in 2020.

What We Received: Instead of having 10-15-minute headways between trains, the Yellow Line runs every 15 minutes during peak-periods and every 30 minutes during other parts of the day.

#### 2. Travel Times

What We Were Promised: TriMet predicted travel times to be 24 minutes from Downtown Portland to the Expo Center and 19 minutes from Downtown Portland to N Lombard.<sup>[1]</sup> Light rail speeds were projected to reach 15.3 miles per hour (mph), and bus speeds were projected to be 13.2 mph in 2005.<sup>[2]</sup>

What We Received: Actual travel times are slower than predicted. It takes 35 minutes to take light rail from Downtown Portland to the Expo Center and 28 minutes from Downtown Portland to N Lombard, even though light rail has its own exclusive right of way. Actual travel times are 45.8% greater to the Expo Center and 47.4% greater to N Lombard. Actual light rail speeds in the corridor only hit 14.1 mph in 2005 while bus speeds averaged 16.1 mph—significantly faster than predicted.

#### 3. High ridership

What We Were Promised: The FEIS forecasted ridership in the corridor to dramatically increase with the building of the Yellow Line. By 2020 the line's ridership was expected to have 18,100 average weekday riders.

What We Received: At no point since the Yellow Line opened has ridership met projected levels. In April 2019 ridership only reached 13,270, 26.7% less than projected. This number will not meet 2020 projected levels based upon the negative trend observed over the past three years. From March 2016 to March 2019 ridership levels decreased by 3.6%. Lower than promised ridership isn't unique to the Yellow Line; every TriMet rail forecast has been wrong, and always wrong on the high side.

### **Light Rail Is Not Superior to Bus Transit**

The Yellow Line was expected to provide superior service compared to the no-build bus alternative. This forecast hasn't panned out. The Yellow Line replaced Line #5, which if it were still operating, would have seven-minute headways between Vancouver and Downtown Portland. C-Tran express service was forecasted to have three-minute headways.<sup>[3]</sup>

Light rail does not reach any more people or businesses than Line #5 did. In fact, Line #5 had more stops along Interstate Avenue, meaning some riders now have a longer walking commute to the MAX stations.

TriMet bus service from Vancouver to Downtown Portland continues to be an option even after the Yellow Line's construction. Line #6 was changed to pick up the link between Jantzen Beach and the Yellow Line's Delta Park stop that Line #5 had previously serviced. It then continues down MLK Boulevard to the Portland City Center.

In Spring 2019, Line #6 saw 665 average weekday on/offers at Jantzen Beach and only 190 total on/offers at Delta Park. This means that the vast majority of Vancouver commuters on Line #6 opt to stay on the bus to Portland instead of transferring to the Yellow Line.

Given the Yellow Line's history, we can expect the prospective SW Corridor light rail project to increase traffic, have fewer trains than promised, and have lower ridership than predicted. If ridership levels are 26.7% below forecast 15 years into service, why should the SW Corridor ridership estimate of 43,000 daily boardings be taken seriously? The FTA should not offer TriMet additional light rail funding in the future if TriMet is unable to honor its past promises.

TriMet may argue that service levels are below EIS forecasted levels due to a lack of funds. However, TriMet's revenue increase in recent years tells otherwise. Between 1998 and 2018, passenger fares increased by 116% and tax revenue increased by 64%. TriMet's payroll tax has been increasing since 2005 and will continue to go up every year until 2024. There is no issue with revenue; rather, the issue lies with light rail.

Moving forward, Metro and TriMet should focus on creating a more reliable bus network that runs on an already built road system. Doing so will benefit riders and taxpayers alike.

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<sup>[1]</sup> Federal Transportation Authority, Interstate MAX Before and After Study, 2005, 2-5.

<sup>[2]</sup> *Id.*, 2-10.

<sup>[3]</sup> North Corridor Instate MAX Light Rail Project, Final Environmental Impact Statement Executive Summary, October 1999, S-17.

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Click here for PDF version:

[https://cascadepolicy.org/wp-content/uploads/2019/09/19-19-The-MAX-Yellow-Line-A Look Back After 15 YearsPDF.pdf](https://cascadepolicy.org/wp-content/uploads/2019/09/19-19-The-MAX-Yellow-Line-A-Look-Back-After-15-YearsPDF.pdf)

\*\*\*\*Audited\* TRIMET SERVICE AND RIDERSHIP INFORMATION as of 10/30/2024 excerpts

<https://trimet.org/about/pdf/trimetridership.pdf>

## Operating Costs/Boarding Ride

	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
Bus	\$2.92	\$2.86	\$2.90	\$3.06	\$2.92	\$2.83	\$3.07	\$3.43	\$3.80	\$4.11	\$4.95	\$9.60	\$7.81	\$7.28	\$7.18
Rail	\$1.73	\$1.61	\$1.71	\$1.87	\$1.99	\$2.14	\$2.36	\$2.61	\$2.95	\$3.28	\$4.38	\$9.04	\$6.87	\$7.13	\$8.34

## System Costs/Boarding Ride

Bus	\$3.71	\$3.72	\$3.81	\$4.02	\$4.03	\$3.83	\$4.21	\$4.61	\$5.10	\$5.46	\$6.69	\$13.20	\$10.19	\$10.55	\$9.81
Rail	\$2.39	\$2.23	\$2.35	\$2.58	\$2.81	\$2.92	\$3.23	\$3.51	\$3.95	\$4.32	\$5.77	\$12.07	\$8.87	\$9.87	\$10.60

## Subsidy/Boarding Ride (6)

Bus	\$2.02	\$1.94	\$1.95	\$1.99	\$1.82	\$1.73	\$1.96	\$2.29	\$2.67	\$3.06	\$3.90	\$8.67	\$6.87	\$6.47	\$6.43
Rail	\$0.76	\$0.61	\$0.68	\$0.68	\$0.77	\$0.92	\$1.12	\$1.36	\$1.71	\$2.10	\$3.23	\$8.02	\$5.84	\$6.24	\$7.50

Notes and Definition of Terms: \* All financial information are based on audited statement.

1 WES - Service begins in February 2009, operating weekday during AM and PM peaks hours between Beaverton and Wilsonville.

2 LIFT/Cab/TNC - Cab revenue Hours and Miles are based on the meter on and off times and billed mileages. TNC Service begins in May 2023.

3 **System Costs** - Operations cost plus general administrative costs shared across modes and OPEB (i.e. finance, planning, scheduling, etc.). Waivered Non-Medical program, Streetcar, and intergovernmental pass-throughs are excluded.

4 WES - Total actual costs incurred prior to February 2009.

5 **Operations Costs** - Transportation costs & maintenance costs (all related staff & materials). For bus & rail also includes facilities, field ops, fare inspection, field ops admin, security and store costs. Excluded Ride Connection costs, Unfunded Actuarial Accrued Liability and OPEB.

6 **Subsidy per Boarding Ride** - The difference between the passenger revenue per ride and the operating cost per ride. This represents the portion of the cost of each ride that must be subsidized (primarily by taxes).

7 COVID-19 began in March 2020.