Cascade Policy Institute
OREGON

April 22, 2026

Metro Council
600 NE Grand Avenue
Portland, OR 97232

RE: April 23 meeting, Agenda items 5.1 and 6.2

Dear Councilors:

I am writing to comment on Res. 26-5563 (Transportation Demand Management strategy) and Ordinance 26-1536 (amending the 2023 RTP to include the LPA for the 82nd Avenue transit project.

Transportation Demand Management (TDM)

TDM has been part of the Metro playbook for decades, with a consistent record of failure.

The central problem can be found on page ES-1, ***Defining Transportation Demand Management***:

> TDM encompasses a range of programs and strategies aimed at influencing travel behavior, specifically reducing the demand for driving alone and encouraging the use of more sustainable, efficient, and shared modes of transportation.

Influencing travel behavior is difficult, especially when your goal is to "get people out of their cars." Driving for most people is a practical necessity, not a luxury. They resent being harassed by government planners.

VMT reduction policies have been in effect since LCDC adopted the Transportation Planning Rule (TPR) 1991. The mandate was to reduce per capita VMT by 10% over 20 years, and 20% over 30 years. There is no evidence that this ever happened.

The first state-ordered TSPs were due by November 1993, but many jurisdictions could not meet the requirement. The deadline was then moved to May of 1996. This was followed by a formal evaluation of the program by consultants Parsons Brinckerhoff and ECONorthwest, in 1997. The consultants found that MPOs were not meeting the TPR requirement to reduce per capita VMT by 20% over 30 years, and did not anticipate that they could.

Metro planners predicted that the 2040 Growth Concept would only reduce per capita VMT by 5.2 percent compared to 1990 levels – but it would take 50 years to do so, not 30.

Even if it could work, measuring VMT/capita is virtually impossible. This was noted in a consultant memo several years ago (Wright and Rudzinski, footnote 15): "The Division 44 VMT reduction targets cannot currently be measured using Metro's Regional Travel Demand Model."

Why adopt a policy that can't be measured?

There is also a growing body of literature showing that for transit-dependent, low-income workers and job seekers, improved access to car ownership will ***vastly increase employment opportunities and wage growth***. We should be ***promoting*** automobile access for low-income households, not stifling it with road diets and propaganda campaigns.

RTP targets and performance measures

On page 57, Table 7, Metro lists a target of reducing VMT per capita by 35% by 2050, starting from a 2005 baseline. The TPR had a 30-year goal that was never met. Why do Metro planners think we'll see a different outcome if we adopt a 45-year goal?

On page 66 there is a "mode share" performance measure with a target of tripling mode share for transit, bike and pedestrian travel relative to 2010. We are now 15 years removed from the baseline year, so what progress has been made? If the answer is "none", then these targets should be reconsidered.

82nd Avenue LPA

Since TriMet is reducing service and will likely cut more service next year, it's difficult to understand why Metro is approving a project budgeted for $344 million. TriMet has lost money every year for the past decade, and the deficits are growing. This is not the time for expensive capital projects.

Moreover, the project design makes no sense considering that TriMet only operates one bus route on 82nd Avenue. As my colleague Randal O'Toole noted in a recent essay:

> TriMet has scheduled as many as 160 buses per hour in the downtown bus mall. Istanbul has a busway that moves around 240 buses per hour. An exclusive bus lane through the Lincoln tunnel connecting New York City with New Jersey moves as many as 650 buses per hour.
>
> TriMet's use of 82nd Avenue won't come close to those numbers. Instead, it expects to run just six buses an hour during peak periods, and as few as two buses an hour on weekends. That will leave the bus lanes about 95 percent empty.

Why would TriMet demand half of the through-traffic lanes on 82nd for its buses? One possible answer was provided by the CEO of Los Angeles' transit agency when it was trying to do the same thing on major streets throughout that city. "It's too easy to drive in this city," said Los Angeles Metro chief executive Phillip Washington.

Attracting new bus riders means "actually making driving harder."

All of this shows just how much TriMet and other Portland transportation agencies are detached from reality. U.S. Department of Transportation data show that transit carried less than 1.3 percent of passenger-miles in the Portland urban area in 2024, down from 1.9 percent in 2019.

Conclusion

Metro Councilors have been badly advised on these matters for decades. The TPR failed, the Metro 2040 Plan is failing, yet transportation planners seem unable to learn from experience.

I suggest you start requiring empirical evidence in support of claims being made regarding behavioral modification projects. If such evidence is not forthcoming, you'll know that the recommended plans will fail again.

Sincerely,

John A. Charles, Jr.
President & CEO