



Forest Park Neighborhood Association

C/O Neighbors West Northwest
2257 NW Raleigh St.
Portland, Oregon 97210

September 26, 2017

Portland Planning and Sustainability Commission
1900 SW Fourth Avenue, Suite 7100
Portland, OR 97201

Re: Comments on Proposed Draft TSP Update: Stage 3

Dear Planning and Sustainability Commission,

Forest Park Neighborhood is unique. Our boundaries touch W. Burnside on the south and cross NW Cornelius Pass Road on the north. The neighborhood includes Forest Park, a long swath of City of Portland, as well as a broad swath of unincorporated Multnomah County.

We appreciate the many policies in the Draft that will protect the environment and reduce congestion and carbon emissions throughout the city.

We are grateful to PBOT staff for adding policy language about Transportation Demand Management in the west hills in response to the large number of comments on the Discussion Draft that requested such a policy, and we support the draft policy language. As those comments show, our residents want new options suitable for this area that can reduce the “through” traffic that badly clogs the limited roads over the hills.

Congestion on the through roads over the hills has become a very serious problem over the last few years, and is rapidly getting worse. Every part of Portland struggles with congestion, but our area has unique problems and needs special attention. Unlike other areas, drivers here have no real options – transit, walking, and biking are not realistic options for reasons unique to our area. These roads run through Forest Park and important wildlife and riparian corridors around the park. Vehicle emissions (exhaust, liquids, and heavy metals from brake pads) contaminate the park and harm wildlife and habitat that performs valuable ecosystem services. Congested roads are virtually impassable for emergency vehicles. The limited number of through roads, due to geographic constraints and the park, means there are few alternate routes.

These roads are choked with single occupant vehicle commuters from Scappoose, Vancouver, and Portland driving to or from Washington County on long point-to-point drives with no stops in our neighborhood. These limited through roads are lined not with dense homes, schools, and businesses that support transit, but with parks and natural resources.

The long periods of congestion diminish neighborhood livability and health, increase carbon emissions, limit freight mobility, and harm the environment and Forest Park. Reducing the number of vehicles on these roads through a TDM program also makes them safer for cyclists.

We also appreciate and support the new sub-policy about protecting Forest Park’s natural resources, which responds to our comments on the Discussion Draft. Forest Park’s 5000 acres not only provide recreation, but also filter and slow stormwater, cleanse our air, and protect

wildlife habitat of statewide significance. Habitat in the Tualatin Mountains is of regional and state importance (and includes the ODFW Forest Park Conservation Opportunity Area (COA ID: 058, <http://oregonconservationstrategy.org/conservation-opportunity-area/forest-park/>).

We support these two new or revised sub-policies in the Western Neighborhoods Pattern Area, which appear on pages 3-13 and 3-14, with one obvious correction (shown in strikethrough):

Policy 3.103 Western Neighborhoods trails. Develop pedestrian-oriented connections and enhance the Western Neighborhoods’ distinctive system of trails to increase safety, expand mobility, access to nature, and active living opportunities in the area.

A. **TDM strategies.** Explore and emphasize Transportation Demand Management strategies and tools, that function in spite of unique topographic conditions of the West Hills, to provide effective options for commuters while reducing carbon emissions, improving neighborhood livability and cycling safety, and protecting important natural resources.

B. **Forest Park natural resources.** Protect the ecological quality and function of ~~natural~~ Forest Park’s natural resources in the design and development of transportation projects in or near the park and avoid, minimize, then mitigate adverse impacts to wildlife, habitat, and riparian corridors.

While we strongly endorse these two new sub-policies, we nevertheless ask that you restructure this section – these sub-policies don’t seem to fit under the “Trails” Policy (Policy 3.103). We suggest moving some of the other sub-policies from 3.103 to 3.100 (Active Transportation) and re-writing Policy 3.103 into a policy about Transportation Options (which are not exclusively Active Transportation) or Protecting Livability and Natural Resources, and then place the two new sub-policies and possibly some of the current sub-policies under Policy 3.103.

Regardless of the Policy structure, we support these two new sub-policies for Western Neighborhoods. We are grateful for this staff response to public input.

We don’t agree with staff, though, that Policies 9.4 and 9.46 adequately replace Objective OO, about reducing cut-through traffic for Western Neighborhoods Pattern Areas.

Objective OO Cut-through traffic. Reinforce improvements to street design to reduce or mitigate neighborhood cut-through traffic and support the appropriate use of streets designated for commuter and pass-through traffic.

We ask that this language be retained as a sub-policy. Policy 9.4 is a general policy that says streets should function as intended, and 9.46 is about slowing and reducing traffic volumes. Cut-through traffic is a specific problem that is rampant in our area, generally due to significant congestion on other routes (much of our cut-through traffic is due to congestion on Hwy 26 and I-5). If a general policy eliminated the need for detailed policy language, we could probably reduce the TSP to a single policy that says “Make the appropriate decisions for our transportation system,” but instead we spell out specific detailed policies, and a specific policy is appropriate here.

We also disagree with the proposal to delete the 2007 Objective opposing new Regional Trafficways. If this language (shown on p. 210 of 233 in the PDF of the Proposed Draft and included below) is deleted, there doesn’t seem to be any policy left in the TSP that opposes new

Regional Trafficways. We ask that this language be retained, perhaps in the Western Neighborhoods Pattern Area section if it is no longer appropriate for the city as a whole:

Objective Regional Trafficways (formerly Objective 6.32)

- a. Regard the City's Regional Trafficway system within Portland to be substantially complete, except for safety or other improvements to existing facilities that increase their efficiency.
- b. Oppose extension of a new circumferential freeway north of US 26 into the City and through Forest Park.

There are very active efforts to construct a westside bypass freeway, and a proposal for a new road through Forest Park in Washington County's Transportation Futures Study, so this language is particularly important.

Thank you for your consideration.

Sincerely,



Carol Chesarek, President
Forest Park Neighborhood Association