

To whom it may concern:

I am writing to submit written testimony in connection with the September 26, 2017 hearing on the TSP Stage 3 Proposed Draft.

Specifically, I am writing to strongly oppose the reclassification of SE 20th (Division to Hawthorne) from a Local Service Traffic Street to a Neighborhood Collector (TSP Update p. 4-66).

I previously submitted comments on the Discussion Draft of the TSP Update objecting to the proposed traffic street reclassification of SE 20th (Division to Hawthorne) from a Local Service Traffic Street to a Neighborhood Collector. I also joined over 55 other residents in a letter objecting to the proposed reclassification. Those objections are attached.

In response to these objections, the City cited "a policy conflict between the current Neighborhood Collector on 26th/Harrison/30th and the Harrison Neighborhood Greenway." The City explained that "removing the 26th/Harrison/30th Neighborhood Collector without replacing it elsewhere would leave a 1.5-mile gap between collector/arterial streets in the area, from 12th Ave. to Cesar Chavez Blvd." The City pointed to "regional policy guidance" that "suggest[ed]" a 1/2- to 1-mile spacing of collector-level streets. The City also opined that "SE 20th Ave already functions as a Neighborhood Collector, with traffic volumes and types of trips that do not meet the definition of Local Service Traffic street," and that "the reclassification is not expected to result in increases in traffic speeds or volumes."

The City's objections are not supported by its own policies or evidence. First, as a threshold matter, whenever the existing use of a street does not comply with its classification, "no additional investments should be made that encourages that inappropriate use." 2007 TSP Policy 6.4D; TSP Update Policy 9.4.d. The City's recognition that SE 20th (Division to Hawthorne) already functions as a Neighborhood Collector means that, instead of reclassifying the street to Neighborhood Collector, it should undertake calming measures so that the street functions according to its current classification.

Second, the City cited no evidence of its determination that a reclassification of either SE 20th or the 26th/Harrison/30th Neighborhood Collector was necessary to effectuate the Harrison Neighborhood Greenway. Indeed, it is a mystery as to how the City made this determination - i.e., what data it considered, etc., whether it considered other streets or calming methods, which ones, etc.

Third, there is no evidence that the unspecified "regional policy guidance" on which the City claimed to rely in determining that a Neighborhood Collector was needed every 1/2- to 1-mile was either mandatory or justified in this particular instance. Indeed, although the proposed reclassifications of SE 20th and 30th create an east-west spacing of approximately 1 mile, the collectors at SE 11 and 12 are only 0.4 miles further west. There is no evidence that the "policy guidance" is so rigid as to mandate a spacing of 1 mile when the alternative is spacing of 1.4 miles.

Fourth, when, as here, the City insists on imposing not just unwanted change, but a more dangerous and degraded environment on its residents, it should at least make an effort to mitigate the harm. SE 20th (Division to Hawthorne) has suffered for years from high-speed traffic and the

lack of safe crosswalks. The City has not so much as put up a speed limit sign to slow traffic, much less create safe crosswalks.

In sum, I do not agree that the City should be in the business of sacrificing the safety and livability of one part of a neighborhood (i.e., SE 20th) to make a different part (i.e., SE 26th/Harrison/30th) more safe or livable. And it should especially not do that without articulating a justification that has basis in policy or actual facts or data, as here.

I respectfully request that the Commission reject the proposed reclassification of SE 20th (Division to Hawthorne) from a Local Service Traffic Street to a Neighborhood Collector.

Thank you for your consideration,

James Barrett
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Date: July 20, 2017

Courtney Duke, AICP
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RE: Comments on Discussion Draft of the Transportation System Plan (TSP) Update, Stage 3: Proposed Traffic Street Reclassification of SE 20th (Division to Hawthorne)

Dear Ms. Duke:

The undersigned residents of SE 20th and surrounding neighborhoods of Ladd's Addition and Colonial Heights **strongly oppose** the reclassification of SE 20th (Division to Hawthorne) from a Local Service Traffic Street to a Neighborhood Collector (TSP Update p. 4-65) and from a Secondary Emergency Response Street to a Major Emergency Response Street (TSP Update p. 4-29).

We believe that the proposed reclassification of SE 20th will drastically decrease the safety of residents, pedestrians, and bicyclists; degrade the livability and attractiveness of the street and surrounding neighborhood; and encourage further vehicle congestion and improper use of a residential street as a north-south throughway. The proposal also conflicts with many Goals, Policies, and Objectives outlined in the Portland Comprehensive Plan ("CP") and the TSP, as further described below.

- **Reclassification of SE 20th Is Not the Preference of Residents and Property Owners.** Local Service Streets like SE 20th (Division to Hawthorne) are intended to provide "a safe and pleasant place for pedestrians and residents," and "[p]reference should be given to the needs of residents and property owners along the street." 2007 TSP p. 5-18. The proposed reclassification of SE 20th will not enhance the safety or pleasantness of the street for pedestrians and residents. It will have the opposite effect. It will also be directly contrary to the preferences of the undersigned residents and property owners.

- **Reclassification of SE 20th Will Conflict With Its Current Use.** SE 20th's current classification as a Local Service Traffic Street must be used "to determine the appropriateness of street improvements and to make recommendations

on new and expanding land uses.” 2007 TSP Policy 6.4.A. Any proposed change should enhance, not degrade, the street’s current function, which is to provide “local circulation for traffic, pedestrians, and bicyclists and (except in special circumstances) [to] provide on-street parking.” TSP Policy 6.5.F. Whenever the existing use of a street does not comply with its classification, “no additional investments should be made that encourage that inappropriate use.” 2007 TSP Policy 6.4.D; TSP Update Policy 9.4.d. The proposed reclassification of SE 20th will violate these Policies.

At the June 20, 2017 General Meeting of the Hosford-Abernethy Neighborhood District Association (“HAND”), you stated that PBOT proposed to reclassify SE 20th as a Neighborhood Collector to advance the agency’s goal of routing TriMet buses on the street. This would result in a further and significant decrease in safety, degradation of livability (e.g., noise, pollution), and elimination of some or all on-street parking, all of which is, again, contrary to the foregoing Policies.


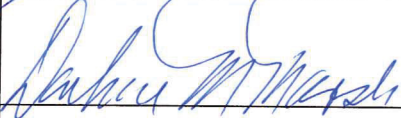



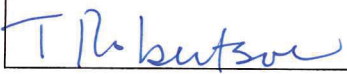
- **Reclassification of SE 20th Will Encourage Dangerous, High-Speed Through Traffic.** If reclassified as a Major Emergency Response Street, SE 20th will experience an increase in dangerous, high-speed through traffic. This conflicts with its current classification as a Local Traffic Service Street, (where closure of street segments is permitted), and would also conflict with the proposed reclassification as a Neighborhood Collector, (where “through traffic should be discouraged”). See TSP Update Policy 6.5 E & F. In addition, under the proposed reclassification, the speed bumps on SE 20th would remain only “temporarily,” and only “subject to the approval of Portland Fire and Rescue,” until the street is repaved or undergoes an undefined “major modification.” TSP Update Policy 6.10.A.b. PBOT has provided no assurances that Portland Fire and Rescue will allow the speed bumps to remain, even temporarily. And although the draft TSP Update would permit the replacement of speed bumps with “speed cushions,” the latter are much less effective and would still result in increased traffic speeds. High-speed through traffic on SE 20th has been a long-time problem and safety concern for residents. Several years ago, the residents and property owners raised \$12,000 to pay for the existing speed bumps. A reclassification of SE 20th that mandates the eventual removal of those speed bumps would violate the due process rights of those who contributed personal funds to pay for them.

- **Reclassification of SE 20th Is Inconsistent With Neighborhood Planning.** Lastly, the proposed reclassification of SE 20th fails to comply with many of Portland’s Goals, Policies, and Objectives for the planning of its neighborhoods, including but not limited to the following:



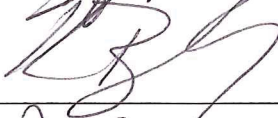
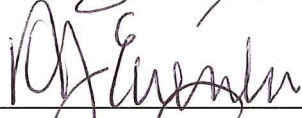

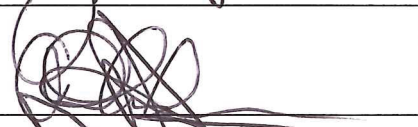

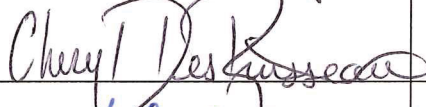
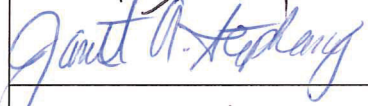



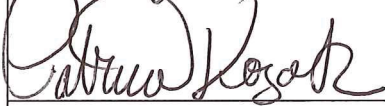


- It fails to comply with the design approach to residential areas of Inner Neighborhoods by, *inter alia*, failing to “reduce or mitigate cut-through traffic and support the appropriate use of streets designated for commuter and pass-through traffic” (TSP Policy 3.92, Objective Q);
- It fails to give priority to pedestrian access in an area where high levels of pedestrian activity exist (CP Policy 9.2.b);
- It fails to give priority to bicycle access and mobility where high levels of bicycle activity exist (CP Policy 9.2.c);
- It fails to improve pedestrian safety, accessibility, and convenience (CP Policy 9.19);
- It fails to create conditions that make bicycling more attractive than driving for most trips of approximately three miles or less (CP Policy 9.20); and
- It fails to encourage traffic speed and volume that is consistent with safety, the enhancement of neighborhood livability, and system goals of calming vehicle traffic (CP Policy 9.46).

In closing, the undersigned join HAND in emphasizing that our residential streets should be classified as Local Service Streets and that PBOT should focus on ways to minimize through-traffic and speeds so that our neighborhood is safer. The proposed reclassification of SE 20th will not accomplish these goals.


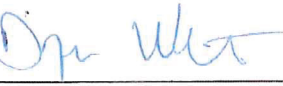

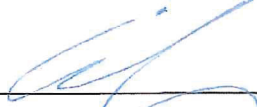


Sincerely,

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July 21, 2017

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**RE: Comments on Discussion Draft of the Transportation System Plan (TSP) Update,
Stage 3: Proposed Traffic Street Reclassification of SE 20th (Division to Hawthorne)**

Dear Ms. Duke:

For the reasons set out in letters previously submitted to you, I join the Hosford-Abernethy Neighborhood District Association (HAND) and the residents of SE 20th and surrounding neighborhoods of Ladd's Addition and Colonial Heights in **strongly opposing** the reclassification of SE 20th (Division to Hawthorne) from a Local Service Traffic Street to a Neighborhood Collector (TSP Update p. 4-65) and from a Secondary Emergency Response Street to a Major Emergency Response Street (TSP Update p. 4-29).

I write separately to make the following additional points, some of which are based on personal experience and observation:

- **There Is No Basis for Reclassifying SE 20th as a Neighborhood Collector.** As a starting point, the basis for PBOT's proposal to reclassify SE 20th as a Neighborhood Collector is murky, and not apparent in the draft TSP Update. At the June 20, 2017 General Meeting of HAND, you suggested that the reclassification was in service of PBOT's goal to increase the number of north-south transportation corridors and to place bus service on the street. If, in fact, this is PBOT's agenda, then the agency should have clearly stated it at the outset and provided impacted residents with adequate notice and opportunity to comment. On the merits, pointing to the need for additional north-south transportation corridors as a justification for reclassifying SE 20th makes little sense when the draft TSP Update also proposes to declassify an existing north-south Neighborhood Collector at SE 26th. Indeed, this raises obvious questions: On what basis did PBOT determine the need for an additional north-south Neighborhood Collector on SE 20th given its (apparent) determination that an existing north-south Neighborhood Collector only six blocks east is unnecessary? If PBOT concluded it could afford to lose a Neighborhood Collector at SE 26th if it gained one at SE 20th, what factors did it take into account and how were those factors weighed? If only one Neighborhood Collector is actually necessary in the near vicinity, why did PBOT not maintain the status quo? No information answering these questions was provided in the draft TSP Update.

- **There Is No Basis for Reclassifying SE 20th as a Major Emergency Response Street.**

Emergency vehicles already use SE 20th routinely. Those of us who reside on the street know this from personal observation. The type of speed bumps that are in place (low and wide “humps”) are useful primarily as visual cues for drivers to slow down on a street that (inexplicably) lacks speed limit signs. This also makes the speed bumps (somewhat) useful as safer crossing points for pedestrians on a street that, with the exception of the stop sign at SE Harrison, lacks safe, marked crossing points. Vehicles intent on exceeding the un-posted speed limit – including, but not limited to emergency vehicles – are not meaningfully impeded by the speed bumps at all. For that reason, there is no apparent need to reclassify SE 20th as a Major Emergency Response Street. To put it another way, there is no evidence of which I am aware – and certainly none identified in the draft TSP Update – that SE 20th’s current classification has impeded emergency vehicles or access to a resident in distress. There is also no evidence of which I am aware – and, again, none identified in the draft TSP Update – that current emergency response streets are inadequate.

- **Allowing Increased Speeds on SE 20th Will Endanger Residents, Pedestrians, and Bicyclists.** I live near the corner of SE 20th and SE Locust, which is currently a very dangerous intersection. For example, cars exiting Ladd’s Addition from SE Locust do not have a clear view of either northbound or southbound traffic. As a result, I have personally witnessed (and narrowly avoided) accidents or near-accidents, especially when exiting Ladd’s Addition from SE Locust turning left, northbound. Any change that would allow increased speeds by emergency vehicles (and, by extension, encourage increased speeds by everyone else) likely would result in the increased frequency and severity of accidents at the intersection.

I respectfully request that PBOT take this letter of opposition into account and **remove** the reclassification of SE 20th as a Neighborhood Collector and Major Emergency Response Street from the Proposed Draft TSP Update that will go before the Planning and Sustainability Commission for public hearing.

Thank you for your consideration.

A handwritten signature in blue ink, appearing to read 'J. Barrett', is written over the printed name.

James M. Barrett