



November 4, 2014

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

Dear Chair Baugh and Commission Members:

The Portland Business Alliance appreciates the opportunity to comment on the city of Portland Transportation System Plan (TSP) and the proposed Comprehensive Plan. The Alliance is committed to improving the region's multi-modal transportation infrastructure, advocating for strong transportation policies and projects that encourage job growth and prosperity. The Alliance has a history of supporting all modes, including freight, auto, bicycle, and transit because each plays an important role in a well functioning transportation system.

We understand that as our population grows the capacity of our city's transportation system will be tested. There will be increased demand for all transportation options including bike/ped, transit, freight and auto. We need to be strategic when crafting transportation policies and investing in projects to ensure a balanced multi-modal system that seeks to accommodate all system users. Projects and policies must be evaluated holistically and trade-offs considered when making investment decisions among a variety of modes.

The proposed criteria to identify Transportation System Plan (TSP) projects do not appear to promote that type of evaluation and instead are unduly biased toward bike/ped and transit. For example, in two of the nine criteria (neighborhood access and health), auto- and freight-oriented projects are not eligible for any points. The transportation system is just that, a system, but the proposed criteria fail to adequately and objectively consider all modes. Furthermore, criteria should be added related to improving the economy, managing congestion and traffic flows, evaluating the number of people benefitted or impacted by a project, and minimizing projects that reduce capacity of the existing system. In the current draft, these issues are not addressed.

It is our understanding that the TSP selection criteria for freight-related projects are to be considered separately under similar but different selection criteria that are yet to be developed. Without the ability to evaluate both sets of criteria simultaneously, it is unclear whether that approach impedes the ability to develop a balanced multi-modal system. Decisions to invest in one mode may undermine another mode, so the criteria should be developed together. There is a significant amount of economic activity and goods movement that occur on all city streets; it is not sufficient to focus only on freight-designated streets and freight-specific projects when determining the impact of transportation projects on goods movement and the economy.

The strong preference for active transportation is also evident in the goals and policies of the proposed Comprehensive Plan, as evidenced by the "green hierarchy." The Alliance supports a multi-modal transportation system, but is concerned about how such a green hierarchy may be

Greater Portland's Chamber of Commerce

200 SW Market Street, Ste. 150 | Portland, OR 97201 | 503-224-8684 | FAX 503-323-9186 | www.portlandalliance.com

applied. While the policy related to the hierarchy states that “all users’ needs are balanced,” explicitly prioritizing certain modes over others does not allow all users’ needs to be balanced, particularly for the vast majority of Portlanders who use automobiles. This concern is exacerbated by policies that seek to “expand the use of streets beyond their transportation function.” As noted, the capacity of the existing system will be tested; reducing the capacity of the system for non-transportation purposes is short sighted given the growth the city is forecasting. At a minimum, current lane capacity should not be compromised as we anticipate growth over the next 20 years.

Thank you for your consideration of these comments. We look forward to working together to refine TSP selection criteria and project lists and comprehensive plan goals and policies.

Sincerely,

A handwritten signature in black ink that reads "Sandra McDonough". The signature is written in a cursive, flowing style.

Sandra McDonough
President & CEO

cc: Mayor Charlie Hales
Commissioner Steve Novick
Leah Treat, Portland Bureau of Transportation
Susan Anderson, Bureau of Planning and Sustainability

APPENDIX OF COMMENTS ON TSP CRITERIA:

- The economic benefit criteria should be strengthened by eliminating “lower cost” language from access to areas of high growth. The need is access and not always “lower cost” access. For example, in some instances investments in freight mobility are needed as opposed to bike/ped investments in order to increase access to traded-sector industrial land that promotes middle-income job growth.
- The economic benefit criteria on revitalization should be on the broader concept of economic vitality instead. The emphasis should be on whether or not a project benefits Oregon’s economy rather than on revitalization projects. Furthermore, there should not be a focus on Neighborhood Prosperity Initiative areas or urban renewal areas but rather more broadly on areas that would benefit from improved transportation access.
- The economic criteria should also factor access to retail, the central city, traded-sector employment, and industrial land.
- The scoring system currently awards up to three points on the positive end but only one point on the negative end. The number of eligible points awarded on both the positive and negative side should be equal to one another. For example, up to three points should be subtracted for negative aspects of a project in order to mirror the three points that are eligible on the positive side. This will ensure a more thorough analysis that acknowledges and considers trade-offs on a project basis.
- A criteria related to managing congestion and traffic flow should be added; this criteria has been used by the Portland Bureau of Transportation in the past.
- A criteria should be added that evaluates relative to other projects, which will have the greatest impact on the greatest number of people.