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To: PDX Comp Plan

Subject: Comprehensive Plan and TSP Comments

The city could make it easier to submit comments than the Map App, which is set up for people to make very specific comments and project recommendations. So I'm submitting my more general comments here. If this is not the "proper" place, please forward them to the appropriate staff and the Planning and Sustainability Commission. I have been involved in the plan amendment process as a member of the Networks PEG and now the TSP TEG, but these comments represent my personal views. Thanks.

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General Comment

I find the plan to generally be a well-crafted document with lots of positive changes from the current Comprehensive Plan. I do agree with the observations of several TSP TEG members that in some cases, the policy language is too "wishy-washy" with terms like "encourage," "support", etc.

Chapter 1: The Plan and Guiding Principles (p. GP1-1)

This contains a bullet list regarding the intent of the plan. The last bullet acknowledges the importance of "consistency and coordination among agencies." This is fine, but it needs to include coordination between city bureaus. Generally speaking, *the plan assumes coordination is occurring* between city bureaus *when all too often quite the opposite is true*. This has often hampered progress in providing active transportation facilities in a timely and cost-effective way. I can provide over 10 examples in SW Portland along where coordination has been poor and bike/pedestrian improvement opportunities lost.

Policy 1.1 Comprehensive Plan (p. GP1-5) talks about plan maintenance. *It needs to stress adopting modal and other plans promptly* and not letting them languish for years as "unofficial" city documents of limited influence. An example is the *Portland Bicycle Plan for 2030*, which was completed in early 2010, and is still not adopted or officially recognized. It will practically need an update before it is finally adopted as an official part of the TSP and Comprehensive Plan.

Chapter 3: Urban Form

Policy 3.20 (p. GP3-10) should refer to "... the region's *multi-modal* transportation hub..."

Figure 3-2 (p. GP3-26) is difficult to interpret. Can corridors have more than one designation, such as civic corridor and freight corridor? Also, the titles for this figure and Figure 3-3 are reversed.

Figure 3-5 (p. 3-29) doesn't include any "enhanced greenway corridors" in SW Portland. Why? This seems particularly strange given the description of SW Portland as having lots of green, ravines, hills, natural areas, etc. Terwilliger would appear to be an ideal candidate, for example.

Chapter 5: Housing

Policies 5.23 - 5.38 (pp. GP5-9 - GP5-11) cover various aspects of housing affordability, but they don't cover the cost of transportation and the importance of providing low-cost transportation alternatives, such as bicycling, walking, and transit. Policies under Health and Safety begin to address this, but not completely, in my opinion.

Chapter 6: Economic Development

Policy 6.42 (p. GP6-14) refers to "multi-modal freight corridors." What does this mean?

Chapter 7: Environment and Watershed Health

Earlier, I had objected to the chapter title of “Watershed Health and the Environment” because it implied that watershed health was the most important and the other environmental issues, including air quality, green house gas emissions, were secondary. Although the title ordering has been reversed, ***I continue to be concerned that watershed health trumps other environmental objectives in practice.*** A couple years ago, I brought the issue to the attention of the city and BAC. BES storm water quality requirements essentially make it much more difficult and costly to provide bike lanes because widening a street is considered "bad" and subject to water quality requirements. This often makes such improvements cost-prohibitive. SW Capitol Hwy. is an example of a city-sponsored project, and the Walgreens and Safeway developments on Barbur Blvd. are private development examples where bike lanes were not provided (in spite of TSP policy and mapped designations), largely due to the associated storm water requirements. Now, the intersections are permanently compromised for safe bicycle use.

Policy 7.12 State and Federal Coordination (p. GP7-8) should be modified to emphasize inter-bureau coordination and cooperation.

Policy 7.24 Impervious surfaces (p. GP7-11) should be modified to acknowledge that impervious surfaces to promote active transportation are environmentally beneficial and deserving of a more balanced and flexible approach.

Chapter 8: Public Facilities and Services

Policy 8.7 Internal coordination (p. GP8-11) notes the importance of internal city agency and bureau coordination “as appropriate.” When would this not be appropriate? This needs to be emphasized as a major theme in the plan especially in this time of dwindling resources. ***The city needs to stop wasting money due to uncoordinated public improvement projects.*** An example: BES recently finished intersection improvements along Terwilliger (at SW 7th and SW Chestnut, which are 200+ feet apart) to address storm water issues. Between these streets, the SB bike lane on Terwilliger drops creating a serious gap, which has been identified for years. So although the city had the right-of-way, crews and equipment on-site to close this bike lane gap (and the urging of several SW residents well before the project started), it did not. To make matters worse, the new sidewalk at 7th will need to be partially removed to provide the bike lane in the future!

Policy 8.43 right-of-way vacations (p. GP8-15) calls for adopting and maintaining city code provisions regarding ROW vacations. It mentions “require pedestrian or bicycles facilities, if needed.” This wording seems awfully vague. Who determines need? Adjoining property owners? Shouldn’t important connections be identified in a plan? This issue may be most important in SW and outer E Portland where undeveloped street ROW can present significant opportunities to provide a more interconnected and convenient active transportation system. This policy should be clarified.

Chapter 9: Transportation

Policy 9.6 Transportation hierarchy for people movement (p. GP9-7) this hierarchy, if implemented, will represent a major shift in transportation for the city. My question is how will freight fit into this? As observed during the last TSP TEG meeting, describing the weighing of modal transportation needs with a “hierarchy” sends the wrong message by implying that motor vehicles will be shunned, and perhaps not even accommodated on some streets. In practice this will not be how it works. Some other term and diagram, which will more closely resemble how this will be implemented in practice would be a better idea and promote clearer understanding regarding the intent. ***I fully support the intent of this policy and decision-making framework,*** and I believe, if done right, will be a valuable tool for thoughtfully and appropriately accommodating the transportation needs of city residents and businesses.

Policy 9.50 On-street parking (GP9-13) how does the management of on-street parking relate to the transportation hierarchy above? In practice, storage of cars in the public ROW often trumps all other roadway users.

Policy 9.51 Off-street parking (GP9-13) covers the private parking side of the equation. The policies should cover how the hierarchy, on-street, off-street, and city parking standards will be coordinated to achieve the desired outcomes – including the accommodation of active transportation.

Policy 9.54 Coordination (GP9-14) covers intergovernmental coordination to plan for and provide transportation facilities. Related to my comments on Policy 8.7 above, there needs to be much better inter-bureau coordination and cooperation to avoid outcomes like the Terwilliger and Barbur examples.

Resilience to Natural Disasters

The plan makes several references related to increasing our resilience to natural disasters. However, it doesn't seem to fully appreciate the extent to which energy supplies could be disrupted - potentially for extended periods. There should be greater recognition about the value of bicycling and walking in the wake of a natural disaster.

List of Significant Projects – Transportation

Citizens are directed to the Map App to make comments regarding the TSP and the project improvements. I find the transportation projects list in Map App to be **completely deficient** in multiple ways:

- **Relationship between lists in the Comprehensive Plan and Map App.** The project list (without a map) in the Comprehensive Plan does not coincide with those shown on the Map App. The city needs to produce **one consolidated list and map(s)** for people to comment on and not give them materials, which are difficult to read, comprehend, and reconcile.
- **Old projects don't necessarily support the new plan.** After adopting the Portland Plan and creating a totally updated Comprehensive Plan, why would we simply dust off the old project list (many, I suppose over 20 years old) as a place to start? How will a fundamentally old project list move us in the new directions articulated in the Portland Plan and Comprehensive Plan?
- **No apparent strategy.** The organization makes the list (at least) appear to be a grab bag of projects leading me to the question – Even if we complete the list, will these investments do the best possible job of supporting the outcomes described in the plan? Will we have a first-rate and functional active transportation network that appeals to people of all ages and abilities? A paper/pdf map would help a bunch. The Map App is cool, but it's time consuming to have to click on each line/dot on the map to know what it is.
- **Most new projects are missing.** Projects from recent planning efforts are not included, and the method for adding them to the list should be clarified. The *Portland Bicycle Plan for 2030* projects are largely excluded in SW Portland and probably other areas of the city as well. The *Central City Plan* prominently features the "Green Loop" as one of the big ideas, but it's not shown. How do projects such as this get onto the list?
- **Many project descriptions are vague and meaningless.** For example, Project 90016 Inner Barbur Multimodal Improvements, includes Barbur from I-405 to Terwilliger. It is a \$4,000,000 project, with a timeline TBD to "design and implement transit, bicycle, and pedestrian improvements." Once completed, how would this portion of Barbur be different? How would we know when it's finished?
- **Cost estimates are often highly suspect and generally too low.** Example: Project 90063 Sunset Boulevard from Dosch to Capitol Hwy. (LP-37) has a \$1.7 million estimate to provide bicycle facilities, sidewalks, and crossing improvements for about 1 mile of roadway. The first phase of this was recently completed for about 3 blocks in Hillsdale for \$800,000. How can the remaining mile be done with a theoretical remaining budget of \$900,000? A big concern is how will projects be fairly evaluated and prioritized when cost estimates may be off by a factor of 10.
- **Some projects make no sense.** Looking at pedestrian and bicycle projects in SW Portland, we typically have expensive, and sometimes unnecessary projects listed. In today's funding climate these projects generally will have no realistic chance of being funded. At the same time, the more affordable and functionally valuable projects, are nowhere to be found. Example: Project 90001 Montgomery to Vista Bikeway is described to "design and implement bicycle facilities" for \$4.5 million. This windy route on several very steep residential streets makes no sense for this level of investment. At the same time, SW Montgomery, which used by the majority of cyclists and pedestrians today, is not listed. With a few safety improvements and wayfinding provided for a small fraction of \$4.5 million, this street could provide a functional and more direct walking and bicycling connection between downtown, Council Crest, and other SW destinations.