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November 17, 2014

Andre Baugh, Chair
Planning and Sustainability Commission
City of Portland

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RE: Portland Bureau of Transportation Testimony on the 2035 Comprehensive Plan Proposed Draft

Dear Mr. Baugh:

Thank you for the opportunity to review and comment on the 2035 Comprehensive Plan Proposed Draft dated July 2014. The Portland Bureau of Transportation worked closely with Bureau of Planning and Sustainability on this draft and the collaboration shows with an integrated approach to policies. This letter outlines a few high level comments and is our official testimony. Specific edits and details are being resolved directly between PBOT and BPS staff and will be presented for PSC and public comment in early 2015.

General Comments

Strength and Clarity We have heard public comments asking to strengthen verbs and identify more specific outcomes. We are working with BPS to identify opportunities to strengthen policies, at a level appropriate for the Comprehensive Plan.

Coordination Policies PBOT supports coordination policies in the document, but suggest they could be stronger both internally to the city and with the region. The addition of the coordination language to Policy 9.58 Project Selection Criteria, however is inappropriate and should be moved to Chapter 8, Public Facilities.

Equity The emphasis on equity is welcome. However, there are inconsistencies in how equity is discussed in each chapter. Sometimes it is overarching policy or framework, other times there are instances of specific language related to equity and equitable distribution. We recommend BPS staff work with other bureaus to provide consistent language.

Streets and ROW as Places PBOT supports changes to a variety of policies that emphasize streets and ROW as more than for just the movement of goods and people. Policies that support ROW as place making and storm water functions support existing and future PBOT programs and projects.

Historic Preservation and Design There are a number of polices that emphasize maintaining neighborhoods. These policies could be in conflict our density and transportation goals.

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Flexibility in Design and Implementation PBOT supports changes to a variety of policies that emphasize flexibility in design and implementation related to context. These policies could be stronger by adding references to the Five Pattern Areas and/or Corridors and Centers.

Finance and Asset Management More chapters should have goals and policies related to finance and asset management. In particular, PBOT would like to discuss ways to better strengthen asset management.

Glossary The glossary needs to be modified to define and clarify the many equity, trails, and greenway related terms throughout the document.

Chapter Specific Comments

Chapter 2: Public Involvement

PBOT strongly supports the efforts to include all Portlanders in City plans and the emphasis on equity throughout the plan. We support the emphasis in this chapter to expand input in decision making from underserved communities and expanding partnerships, while acknowledging the role of the existing neighborhood associations.

We are concerned however by the shift of emphasis from the P&D Draft public involvement policies that applied to 'plans, policy, investment and development decisions' to those that apply to 'land use, decisions and land use projects'. How will transportation infrastructure and other City investment decision processes be equally inclusive? It is unclear how this chapter relates or influences Policy 8.27 Community Involvement in the Public Facilities Chapter. Comprehensive Plan policy language should avoid being applied narrowly to just land use decisions and the work of BPS.

Chapter 3: Urban Form

Centers and Corridors. PBOT continues to work internally and with our stakeholders on how Centers and Corridors are reflected in our project approval criteria, project prioritization, and street classifications. This work will be reflected in the next version of the Transportation System Plan (TSP) update (later in 2015). We recommend that centers and proposed changes to land use and density and possible impacts to transportation system and projects be a topic of one of your work sessions.

Freight and Transit Corridors. Maps and policy language are not consistent related to Freight and Transit Corridors. PBOT staff will work with BPS to help resolve these inconsistencies.

Western Pattern Area and Active Transportation The Western Pattern Area does not use the term active transportation, while all the other pattern areas do. PBOT advocates for additional language in this pattern area that use the term active transportation.

Chapter 8: Public Facilities

Policies 8.77 and 8.78 Trails Policies and Map PBOT is very supportive of the new trails policies and inclusion of a Comprehensive Plan Trails Map. These new policies reinforce the important of trails and will inform trails and of street path policies, classifications and planning in the future. It is worth discussing expanding Policy 8.78 to include the pedestrian and bicycle system as well as the greenway system. PBOT will work with BPS.

Policy 8.43 Right of Way vacations. PBOT and BPS staff is working with the City Attorney to determine the best policy language and subsequent code for this policy.

Chapter 9: Transportation

Vision Zero and Safety. Goals and policies that emphasize safety are excellent additions to the Comprehensive Plan, but the latest version of Goal 9G: Safety is weaker than the previous version. We want to revisit this policy to increase its emphasis on Vision Zero and have new language to propose.

Proposed language: Transportation safety impacts the livability of a city and the comfort and security of those using City streets. Comprehensive efforts to improve transportation safety through engineering, education, enforcement, and evaluation will be used to eliminate traffic related fatalities and serious injuries from Portland's transportation system.

Policies 9.55, 9.56, and 9.57: Transportation Demand Management

Transportation Demand Management programs can be one of the quickest, cheapest and most effective approaches to achieving comprehensive plan goals. PBOT recommends that the transportation demand management policy be treated similar to System Management and Parking Management, and coordinated with both. We will work with BPS to recommend more comprehensive language.

Policy 9.58 Project selection criteria. PBOT recommends changing "Establish" to "Develop and utilize." We recommend replacing "sustainability" with "climate" in the list of outcomes. The City has greenhouse gas emission reduction targets, and includes climate as one of the seven key project evaluation criteria. We also recommend that the coordination portion of this policy be removed.

Policy 9.59 Funding. PBOT recommends strengthening "Encourage the development of..."

Policy 3.59 Transportation This policy references the rivers as historic, current and future transportation infrastructure. PBOT will work with BPS staff to determine if this policy should be in Chapter 9: Transportation, as has been suggested by staff and stakeholders.

Policy 9.6 Transportation Hierarchy. PBOT staff is working internally and with outside stakeholders on implementation tools and hierarchy language. This work may result in modifications which would be proposed in February 2015 as part of this Comp Plan effort or additional details in the later 2015 TSP update. We recommend that this policy be a topic of one of your work sessions.

9.48 – 9.53 Parking Management Policies

PBOT staff is working internally and with stakeholders to refine the parking management policy language and integrate them with related policies, including Transportation Demand Management and Mode share. PBOT will propose revisions by March 2015.

In addition, PBOT is starting a yearlong Citywide Parking Strategy that could inform our Comprehensive Plan recommendations and the 2015 update of the TSP.

Potential New "Integration" Policy: PBOT will determine whether to propose a new project development policy recommending consideration of system management and demand management in capital projects over a certain size.

We look forward to working with the Commission and BPS staff on these issues.

Thank you,

A handwritten signature in black ink, appearing to read 'Art Pearce', written in a cursive style.

Art Pearce, Manager
Policy, Planning and Projects

A handwritten signature in black ink, appearing to read 'Courtney Duke', written in a cursive style.

Courtney Duke, AICP
Senior Transportation Planner
PBOT Comprehensive Plan Project Manager