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March 9, 2015

Portland Planning and Sustainability Commission
1900 SW 4th Ave
Portland, OR 97201

Dear Chair Baugh and Members of the Commission,

Thank you for leading the effort to update the City of Portland's Comprehensive Plan. We are grateful for the opportunity to provide comments on the draft approach and are focused primarily on Chapter 9, the staff report to your commission regarding the transportation system plan, corresponding project list, and financial plan. We look forward to working with you on any and all of these comments and proposals.

At the BTA safety is our number one priority. In every chapter of the comprehensive plan, including the upcoming Transportation System Plan (TSP), we would like to see a stronger emphasis on Vision Zero. Simply put, Vision Zero holds the position that no life is worth losing in the name of mobility and that every crash can and should be avoided. New policy direction in the transportation system plan, with this principle firmly embedded at the core, is critical to reducing serious injuries and fatalities in our neighborhoods.

We would like to see the Portland Bicycle Plan for 2030 incorporated into the TSP in its entirety. It has been five years since the plan was written and adopted by Portland City Council, spending that intervening time in a gray area in terms of providing binding policy direction for the city. It is past time to incorporate this visionary document into our city's guiding policy while redoubling our efforts towards the goal of achieving 25% of daily transportation trips in Portland by bicycle in the year 2030.

Please consider the following proposals and comments regarding the draft goals and policies in Chapter 9 of the Comprehensive Plan:

Goal 9.G: Safety – This goal is not strong enough. It appears at the bottom of the list of goals and does not include a commitment to vision zero. We believe commitments should be made to prioritize human safety above all other goals and for this goal to clearly lay out a path to achieving zero crashes, injuries, and fatalities. This policy should set a specific goal of getting to zero fatalities and serious injuries for all people who use the roads by a specific date.

Goal 9.A: Achieve multiple goals – An emphasis on defining the currently incomplete networks within the city's transportation system, namely walking, biking, and transit networks (Active Transportation) should be made



clear in this goal. Prioritizing efforts to build complete Active Transportation networks would greatly improve this goal.

Goal 9.C: Environmentally sustainable – This goal should align with specific adopted carbon reduction targets such as HB 3543 which codifies greenhouse gas reduction goals: namely by 2010 to begin to reduce greenhouse gas emissions, by 2020 to achieve greenhouse gas levels 10% less than 1990 levels, and by 2050 to achieve greenhouse gas levels 75% below 1990 levels. Additionally, in the 2009 Climate Action Plan, the City of Portland and Multnomah County set targets of achieving carbon reductions of 40% below 1990 levels in the year 2030 and 80% below 1990 in the year 2050. These are bold goals and in Oregon nearly 40% of all carbon emissions come from the transportation sector. Spelling out these goals, committing to achieve them, and setting forth explicit and measurable policies to achieve them will be critical if we hope to be successful.

Goal 9.D: Equitable transportation – This goal is well written and important. It should include the following, “Prioritize transportation investments that create affordable transportation options for all people, ensure fair access to quality jobs, workforce development, and contracting opportunities in the transportation industry, promote healthy, safe, and inclusive communities; and equitably focus on results.”¹

Policy 9.5: Mode share goals and Vehicle Miles Travelled (VMT) reduction – This is a fantastic policy and it should be made more explicit in terms of prioritizing investment, identifying education and encouragement activities to help achieve the targets, and provide more clarity on which bureau will conduct specific actions, with specific deadlines, and include measurable outcomes.

Policy 9.6: Transportation hierarchy for people movement – The Bicycle Transportation Alliance strongly supports the inclusion of the prioritization system defined in this policy.

Policy 9.7: Moving goods and delivering services – This policy lacks a specific reference to the need to reduce single occupancy vehicle trips. Freight system reliability is largely a question of congestion and, to a lesser extent, roadway design. Given that we already have a well defined and statutorily protected freight network ensuring roadway design that accommodates truck mobility, one of the single most effective things we can do to prioritize freight movement is to reduce traffic and congestion through increased walking, biking, and transit trips. This policy should acknowledge these basic facts. Additionally, it should specifically encourage bicycle access in the City’s freight districts and streets and require under-carriage safety bars on trucks. Employees, residents, and visitors on freight streets deserve the opportunity to get to their jobs and destinations safely by bike and this policy should make that opportunity clear.

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<http://equitycaucus.org/sites/default/files/PolicyLink%20Comments%20to%20USDOT%20on%20Proposed%20Rulemaking%20on%20State%20and%20Metro%20Planning.pdf>



Policies 9.10-9.17 Thank you for defining goals that integrate our City's land uses and transportation priorities while pointing out that our streets need to be managed as public spaces. As Portland grows in population we need to be able to evaluate our streets in relation to the adjacent land use. Policies 9.14 and 9.15 are vitally important when it comes to creating safe streets where people can walk and bike and easily access transit. Creative street uses that prioritize people on foot, as in Policy 9.6, should be considered as a component of every development application and transportation project. Please consider strengthening the language in these policies to make it clear that safety, community interaction, and recreation can attain equal footing in transportation decision-making.

Policy 9.21: Bicycle transportation – As previously mentioned in the Transportation Expert Group testimony to the Planning and Sustainability Commission, The City of Portland is aiming too low with this policy. If the City truly seeks to gain bicycle mode share deep into the double-digits, it should seek to make bicycling more attractive than driving for most trips of approximately five miles or less. This radius allows most of inner Portland to find trips to and from downtown to be more attractive trips by bicycle than by auto. This doesn't seem to be a difficult standard to achieve, as long as the City is willing to make the choices required to devote the necessary portions of the public rights-of-way to bicycles, especially on the main arterials that connect downtown to the neighborhoods, and within downtown.

Policy 9.22: Accessible bicycle system – The Bicycle Transportation Alliance strongly supports this policy.

Policy 9.23: Bicycle classifications – We look forward to the continued improvement of the City's bicycle street classifications and would like an opportunity to work directly with staff in pursuit of this policy goal to ensure adequate community involvement and strong representation among people who ride bikes.

Policy 9.46: Performance measures – Establishing multimodal performance measures and using them to improve existing standards such as the auto-oriented "level of service" is absolutely critical to the City's ability to be successful at meeting its safety, climate, VMT, and bicycle use goals. It is hugely concerning to us at the BTA that the Portland Bureau of Transportation has been developing these performance measures for over two years yet they are not completed or published nor do they appear to be included in this current update to the TSP. Our request here is for an inter-bureau work group, including community representatives like the BTA, to come together and determine a path forward to ensure that the new multimodal performance measures are included in this update of the TSP. We do not want to wait for this new tool to be developed and launched while lacking policy adoption until the next update of the TSP.



Policy 9.47: Regional congestion management – We support market based pricing for auto trips and parking as a tool to reduce regional congestion.

Policy 9.48 – 9.50: Parking management – Thank you for including polies to address all the benefits that can accrue from parking management. Taken in concert with Policy 9.15 and Policy 9.47, an explicit approach to managing for policy goals in the curb zone is a powerful tool to meet community demand for our precious public rights-of-way.

Policy 9.53: Bicycle parking – While this is a great policy, it does not go far enough. Please include commitments to increasing bike parking in commercial corridors, among employers, along all transit lines and stations not just those with high capacity, and in the context of all new and remodeled residential development. This City will not be able to accommodate significant growth in bicycling without a robust approach to increasing safe, well-lit, secure, and covered bike parking at every opportunity.

Policy 9.59: Funding – While this policy is good as far as it goes, much more needs to be codified in policy regarding our City’s commitments to increasing funding for critical transportation infrastructure and collaborative partnerships with regional governments and the state when it comes to raising new revenue.

Please consider the following proposals and comments regarding the City staff report to the Planning and Sustainability Commission regarding the transportation system plan.

We would like to echo the comments from the Portland Bicycle Advisory Committee in their letter dated February 22nd from Chair Ian Stude in their support for the TSP Project Selection Criteria. BTA staff participated in the development and trial of these outcome-based criteria and they represent a step in the right direction regarding how we prioritize transportation projects for funding and evaluate their effectiveness.

Basic safety investments in Safe Routes to School, Neighborhood Greenways, and protected bike lanes are the most cost effective at reducing crashes, injuries and fatalities and should be our highest priority. Due to this, as an overall concept, the Bicycle Transportation Alliance strongly supports the creation of new program areas (TSP ID 10005 – 10013) in order to ensure that the City has an opportunity to address small-scale transportation needs in a comprehensive way. These new programs are complimentary to the larger projects and integral to the success of the overall transportation system.

The Bicycle Transportation Alliance strongly supports many of the proposed major projects and citywide programs. Equally, we understand that the city faces hard choices due to limited funding and we look forward to a revitalized effort to raise new revenue to fund street safety and maintenance projects. Our top priorities include the following five programs and ten projects.

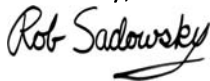


TSP ID	Project Name
10006	Bikeway Network Completion Program
10005	Pedestrian Network Completion Program
10008	High Crash Corridor Program
10009	Safe Routes to School Program
10007	Neighborhood Greenway Program
116460	NE Broadway Corridor Improvements, Phase 1
90016	Inner Barbur Corridor Improvements
116470	I-205 Undercrossing
113610	Portland Bike Share
80020	4M Neighborhood Greenway
116440	North Portland Greenway Segment 5
116330	Gresham-Fairview Trail, Phase 5
50044	Parkrose Neighborhood Greenway
20077	Inner Eastside Pedestrian/Bicycle Bridge
90071	Willamette Greenway Trail Extension

Regarding the Financial Plan Summary contained in the staff report to PSC, the Bicycle Transportation Alliance would like to express our strong support for the overall approach to identifying and forecasting funding opportunities and shortfalls throughout the plan horizon. We are thrilled to see such detailed, if preliminary, twenty year forecasts that include categories such as new parking policy, new regional transportation revenue measures, increases in state revenue from gas tax and vehicle administration fees, and potential federal funds for implementation of vision zero. Our organization stands ready to support the City as they pursue critical funding to implement the goals of this plan.

Thank you, again, for your leadership and hard work to create a comprehensive plan and forward thinking transportation system plan to guide our City's investments and priorities for the future.

Sincerely,



Rob Sadowsky
Executive Director

Cc: Commissioner Steve Novick
PBOT Director Leah Treat
Courtney Duke
Peter Hurley
Eric Engstrom
Noel Mickelberry
Ian Stude

