



Forest Park Neighborhood Association  
C/O Neighbors West Northwest  
2257 NW Raleigh St.  
Portland, Oregon 97210

March 13, 2015

Planning and Sustainability Commission  
1900 SW 4th Avenue  
Portland, OR 97201-5380

Re: Comprehensive Plan and TSP Testimony

Dear Chair Baugh and Commissioners,

Forest Park Neighborhood is unique for the extent and quality of wildlife habitat and headwater streams in our community. The neighborhood includes Forest Park, and extends from West Burnside to Cornelius Pass Road in the Tualatin Mountains. Our wildlife habitat is especially valuable because it helps keep Forest Park connected to the Coast Range and to the Tualatin Valley, ensuring genetic diversity for wildlife and plants.

The neighborhood landscape is also full of steep slopes and landslide hazards. Together with Forest Park, these conditions have left us with narrow unimproved roads that are often cut deeply into hillsides. Residential densities are low, and there are extremely limited commercial or retail resources in the neighborhood.

We like the idea of encouraging folks to bicycle and walk instead of driving to meet their daily needs, but in our area the steep hills and long distances make this impractical. Bicycling on our roads is almost entirely recreational and may result in car trips to the area to access Skyline Blvd without cycling up a steep hill. Most cycling and pedestrian improvements are unlikely to reduce VMT in our area.

Expanding these roadways around Forest Park for any purpose, including bike lanes or sidewalks, almost always requires:

- extensive cut and fill,
- removal of native trees and vegetation,
- creation of harmful breaks in contiguous tree canopy cover,
- constructing vast retaining walls that restrict critical wildlife movement,
- adding Jersey barriers or other barriers to fence off steep drops adjacent to the roadway (which also restrict wildlife movement), and
- installing acres of new asphalt, increasing stormwater runoff into headwater streams.

We might call this transformation “Green to Black,” in contrast to the city’s “Gray to Green” program. We also fear that wider pavement and improved sightlines will enable more speeding and encourage more out of lane driving (using the bike lanes and oncoming traffic lane) that will endanger drivers and cyclists.

New retaining walls, fencing or Jersey barriers, and wider pavements will significantly restrict wildlife movement in and around Forest Park, reducing the park's wildlife internal and external wildlife connections. Adding 4' paved bike lanes to existing 22' roadways will increase the pavement by 36%, a harmful addition to stormwater runoff into valuable, healthy headwater streams.

We support the city's designation of our roads as Scenic Corridors, but wider pavement will transform these pastoral green roadsides into concrete-lined tunnels.

We have two requests. First, that the city add a policy to the Comprehensive Plan that would require PBOT to weigh the harm to wildlife and increases in stormwater against the transportation (as opposed to recreational) value of a proposed transportation project, and to use alternative approaches such as sharrows, signage, and bike pull-outs or passing lanes before considering bike lanes and sidewalks in the sensitive habitat areas in the West Hills, and to minimize and mitigate any expansion of pavement by including wildlife crossings wherever possible. This policy could be specific to the West Hills, or could be broader to cover any high value habitat in the city.

Second, we ask that the city require that TSP projects 60007 and 60015 (adding bike lanes along NW Cornell Road through Forest Park, and along NW Skyline) be reconsidered. Alternative approaches for these projects should be considered.<sup>1</sup>

We're very pleased with policies already in the draft Comprehensive Plan that encourage environmental protections and adaptation to local context, but our recent experience with PBOT suggests that a transportation-specific policy is required in addition to these general policies. For example, PBOT has been reluctant to enforce the codes for scenic corridors in our neighborhood, too often permitting fencing that clearly violated the code, arguing that because the fence was within the right-of-way (and therefore within PBOT's jurisdiction), they weren't required to enforce development codes that were in the purview of BDS.<sup>2</sup>

To their credit, at least in the past, PBOT has allowed innovative approaches to pedestrian pathways along Skyline. However, a recent permit applicant was told that they needed to construct a 7-foot wide raised concrete sidewalk along a section of NW Skyline Blvd where there is a very steep drop off (so a huge retaining wall would be required, resulting in an absolute barrier to nearly all wildlife movement) in an area where adjacent properties are fully developed with no sidewalk. It is highly unlikely that this 7-foot wide island of concrete sidewalk will ever connect to their neighbors along Skyline. Certainly we continue to oppose this particular PBOT mandate, but what we believe is needed is a more sensitive policy in this area, a policy that requires the Bureau to seriously consider the local context, which in this neighborhood means that for any roadway improvement, negative effects on wildlife passage, habitat, headwater streams and the scenic corridor are carefully evaluated, minimized and mitigated.

PBOT also endorsed Metro's plan for the Westside Trail, which includes paved 4-foot wide sidewalks along portions of Skyline that will require retaining walls long and high enough to severely limit wildlife movement around Forest Park. We are opposing portions of the Westside

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<sup>1</sup> We do not oppose adding a single bike lane along the outside lane of NW Cornell Road between NW 30<sup>th</sup> and Audubon Society of Portland because it appears that this can be constructed without new retaining walls, and because the tunnels provide very good wildlife passage in this area.

<sup>2</sup> We suggest that while PBOT should be consulted on any development within their rights-of-way, development code procedures and enforcement should be handled by BDS.

Trail, for the same reasons we object to recent PBOT decisions, which is that planners have not adequately considered, minimized and mitigated negative impacts on wildlife, habitat, view corridors and streams. We recommend that Portland adopt policies within its update that reflect these concerns.

The city's desire to support bicycling and walking currently seems to outweigh environmental and local context policies. Again, we feel that specific language is required to ensure that wildlife, stormwater, and other environmental impacts are weighed (and harms minimized and mitigated) when transportation infrastructure upgrades are considered. For transportation projects within Forest Park, we believe that PBOT should consult with Portland Parks and Recreation. This policy should apply to TSP projects 60007 and 60015.

We believe that TSM (Transportation System Management) and TDM (Transportation & Parking Demand Management) approaches (projects 10012 and 10013) will be much more effective at reducing VMT and safety on the roads in our neighborhood than adding bike lanes and sidewalks.

We do support project 60029, however, to add bicycle facilities along NW Miller Road between NW Cornell and NW Barnes Roads. In this area the habitat is less valuable, and the topography should not require many extensive retaining walls. This road is also serves areas with higher residential densities, transit, schools, and retail and commercial resources, making it more useful for meeting daily needs. This road is relatively level, making it more attractive for cyclists and pedestrians, and it would provide a valuable connection for bike commuters between Washington County and NW Portland.

We think the best approach to reducing VMT and improving safety in our neighborhood is to invest first in reducing vehicle traffic. Beyond that, creative bike and pedestrian improvements should be considered that (1) will not harm the environment, restrict wildlife movement or negatively impact the scenic corridors, and (2) will improve bike and pedestrian access to destinations that serve daily needs (rather than for people who travel to the area to ride their bicycles for recreation). Bicycle improvement projects should also be evaluated based on elevation gain and distance to destinations. Cyclists commuting to work, for example, are not likely to traverse our neighborhood's Tualatin Mountains when there are more reasonable routes available. And it makes no sense to design improvements to encourage them to do so, especially if the improvements will damage wildlife corridors, habitat and headwater streams important to the environmental values of the City of Portland, our neighborhood and to Forest Park.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Jerry Grossnickle". The signature is written in a cursive, flowing style.

Jerry Grossnickle, President  
Forest Park Neighborhood Association