
March 13, 2015

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

Dear Chair Baugh and Commission Members:

The Portland Business Alliance (Alliance) appreciates the opportunity to comment on the Proposed Draft 2035 Comprehensive Plan. We understand the significance of this plan in accommodating future growth; it sets the framework for both infrastructure investment and physical development of the city over the next 20 years. We commend Bureau of Planning and Sustainability (BPS) staff for their hard work over the last several months conducting extensive research and technical analysis to inform the proposed goals and policies to guide the future growth of our city.

Overall, we appreciate the attempt to emphasize the importance of economic development, however there are still opportunities to strengthen the goal of creating a prosperous economy. If we are truly to achieve a “prosperous, healthy, equitable and resilient city” then even greater priority should be given to economic development. A business climate that supports private sector job creation and a robust economy is critical to growing good middle-income jobs and achieving equitable income distribution among households. Many studies show that a key indicator of health and quality of life is a good living wage job. Given this, attached are specific suggestions for improvement to the plan.

The Comprehensive Plan is an opportunity to better align land use and transportation with middle-income job growth. Industrial land is the primary generator of middle-income jobs that do not require a four-year college degree and are critical for a balanced economy. While our region has regained jobs lost at the low and high-end income levels, we have not regained those middle-income jobs lost during the recession. BPS’ own report, *The Industrial Middle of Portland’s Changing Income Distribution*, finds that East Portlanders, whom make up a large share of the city’s middle income workforce, rely on jobs on industrial lands. The middle-income jobs industrial lands generate are significant for achieving an equitable city as previously outlined in the adopted *Portland Plan*.

The availability of market ready industrial lands are also critical for a prosperous traded-sector economy. As we have shown in our Value of Jobs reports, 90 percent of Oregon’s exporters are small and medium sized businesses and export-related jobs pay on average 18 percent more than non-exporting jobs across sectors. In particular, the production of traded-sector goods is still the backbone of Portland-metro’s traded-sector employment and is dependent on adequate industrial land. Manufacturing jobs are also found to provide higher wages and better benefits than non-manufacturing jobs, particularly for communities of color and those with less than a four-year college degree.

The Industrial Middle of Portland’s Changing Income Distribution estimates that if the city’s 600 acre industrial lands shortfall is met nearly 32,000 middle-income jobs would be created and help to

address income polarization in our community. While we appreciate efforts to meet the shortfall with strategies such as brownfield redevelopment and golf course conversion, these options are aspirational at best and do not reflect market realities. The future economic health of our city depends on meeting the shortfall and in order to execute such strategies that promote industrial land development, such as those related to freight mobility. We recognize an updated Economic Opportunity Analysis has been completed and, as a result, these numbers have changed. We will provide additional comment on that at a later date, but would note our concern that the shortfall is reduced in part by lower expectations for the economy's performance.

Unfortunately, there are policies that hinder an adequate supply of industrial land and the potential for industrial development. We understand, for example environmental overlays proposed on new natural areas would actually add to the industrial land shortfall, particularly in the Columbia Corridor and harbor. West Hayden Island is another example where flood and forest mitigation requirements on the 300 acres allocated for industrial land would prevent its actual development. Such policies are in direct conflict with those aimed at meeting any shortfall. We strongly urge that additional actions are not taken to further increase the shortfall of industrial land if and until progress is realistically made on addressing the current shortfall.

While we understand the challenge of addressing a variety of potentially competing issues in one document, there is a need to reconcile and prioritize conflicting goals and policies among different chapters within the plan. The plan itself states, "ensure that the components of the Comprehensive Plan are internally consistent," (Policy 1.3 Internal Consistency). However, there is no guidance for how to reconcile policies that are inconsistent, and conflicting goals and policies are found throughout the plan.

For example, while the economic development narrative in chapter six is strong, some of the policies contained in the chapter are in direct conflict with those in the environment and watershed health section contained in chapter seven. The clash between policies 6.39 industrial brownfield redevelopment and 7.29 brownfield remediation is just one example of internal inconsistency. Policy 6.39 provides incentives and technical assistance for brownfield redevelopment whereas policy 7.29 imposes additional cost burden by incorporating ecological site design and resource enhancement to brownfield remediation. It is obvious that policy 6.39 is more favorable to achieving the stated goal to redevelop 60 percent of brownfield acreage by 2035 whereas policy 7.29 would hinder achievement of this goal.

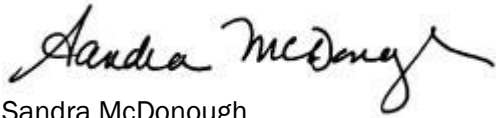
Because the ability to address the significant industrial land shortfall is based on difficult to remediate brownfields, golf course conversions and the like which may or may not come to fruition, under no circumstances should policies be adopted that add additional costs and burdens to redevelopment. The plan tries to accommodate varying interests, and therefore must be read as a whole to understand its implications. Failure to address internal inconsistencies simply kicks the can down the road as future decision makers struggle with how to balance competing priorities.

Furthermore, many of the goals and policies are aspirational and we are concerned about how broadly they may be interpreted when implemented into city code. The subjective and open ended nature of these goals and policies may create legal land use challenges once implemented. To the

extent possible, we strongly urge that goals and policies be as specific as possible and include corresponding action items to avoid misinterpretation in city code and legal entanglements in the future.

Thank you for considering these proposed changes to create a prosperous, healthy, equitable and resilient city. Please let us know should you wish to discuss these comments.

Sincerely,

A handwritten signature in black ink that reads "Sandra McDonough". The signature is fluid and cursive, with a long, sweeping tail on the "y" at the end.

Sandra McDonough
President & CEO

Cc: Susan Anderson
Bureau of Planning and Sustainability

APPENDIX OF COMMENTS

In order to achieve good middle-income jobs for residents in our community the Alliance has concerns and comments in the following key areas:

Policy Balancing and Equity

The proposed comprehensive plan does not provide reasonable balance and equity between the policy chapters, specifically between chapter six (economic development) and chapter seven (environment and watershed health). The following are specific examples of conflicting policies needing reconciliation:

Policy 6.39 on industrial brownfield redevelopment provides incentives and technical assistance for brownfield redevelopment whereas policy 7.29 imposes additional cost burden by incorporating ecological site design and resource enhancement to brownfield remediation. Policy 6.39 should be prioritized to redevelop the stated goal of at least 60 percent of brownfield acreage by 2035. Policy 7.29 would only hinder development of this goal and should not take precedent.

Policy 7.11 requires on-site mitigation unless off-site mitigation within the same watershed will improve mitigation effectiveness. Policy 8.59 seeks to maintain the functions of natural and managed drainage ways, wetlands, and floodplains. Both policies hinder the development of adequate industrial land and middle-income job growth, particularly in the harbor. It is unclear how both policies interface with policy 6.51 on mitigation banks.

Land Supply

The proposed plan does not emphasize the importance of site quality and characteristics on industrial land. It is not just the availability or quantity of industrial land but the quality of the land and site characteristics. The proposed plan does not “protect” industrial lands in the same manner in which it “protects” environmental areas. In general, mitigation requirements should be proportional to the impact of development and no greater, per the recent Koontz case. The following are specific examples where language may be improved to ensure an adequate supply of industrial land that is market-ready to create good middle-income jobs:

Policy 6.36a **No net loss of prime industrial land.** Strictly limit quasi-judicial comprehensive plan map amendments **and text amendments** that convert prime industrial land and consider the potential for amendments to otherwise diminish the economic competitiveness or viability of prime industrial land.

Policy 6.36.b **No net loss of prime industrial land.** **Strictly** limit conversion of prime industrial land through land use plans, regulations, or public land acquisition for non-industrial uses, especially land that can be used by river-dependent and river-related industrial uses.

Policy 6.36.c Identify how regulations affect the capacity, affordability and viability of industrial uses, and **avoid** those impacts.

Policy 6.36.d **Offset** the reduction of development capacity as needed, with additional prime industrial capacity that includes consideration of comparable site characteristics.

Policy 6.44 Impact analysis. **Ensure adequate supply of industrial land by evaluating and monitoring the impacts of land use plans, regulations, public land acquisition, public facility development, and other public actions on industrial land capacity. Actions that would increase the shortfall of industrial land should not be taken until the current shortfall is met.**

Policy 6.48 Golf course reuse and redevelopment. Facilitate **conversion of** privately owned golf course sites in the Columbia Corridor **for industrial development.**

Policy 6.50 Public facilities and land acquisition. **Strictly** limit the use of prime industrial land for parks or other non-industrial public facilities.

Policy 7.11 Mitigation effectiveness. Encourage mitigation approaches that **are proportional to the impact of development.** Require on-site mitigation unless off-site mitigation within the same watershed will improve mitigation effectiveness.

Transportation

We understand that as our population grows there are capacity concerns about our city's transportation system. Yet, there are policies that compromise our system's capacity particularly for vehicular movement throughout this chapter. We recognize that there will be more people and increased demand of all modes. The chapter has a pervasive bias for active transportation, however, and while we understand there will be increased demand for these travel options there will also be increased demand for vehicular movement. We need to be strategic when crafting policies to ensure a balance of modal options and a system that will promote a healthy, vibrant, and prosperous community. While there are many policies included in the draft Plan that promote economic efficiency and that we support, we have focused our comments below on suggestions for changes where we do have concerns.

Policy 9.6 Transportation hierarchy for people movement. Implement a hierarchy of modes for people movement by making transportation system decisions according to the following prioritization:

1. Walking
2. Cycling
3. Transit
4. Taxi / commercial transit / shared vehicles
5. Zero emission vehicles
6. Other private vehicles

While this "green hierarchy" of modes applies only to the movement of people, it should be made clear that it does not apply to freight corridors and the movement of goods. This hierarchy should not be applied to freight districts, regional truck ways, priority truck streets, and major truck streets as designated in the city's Transportation System Plan (TSP).

For facilities not identified as freight facilities in the TSP, we suggest that, in cases where there is overlap between the "movement of people" and the "movement of goods and services," that freight be prioritized and the green and active transportation hierarchy not applied.

Policy 9.15 Repurposing street space. Encourage repurposing street segments that are not critical for transportation connectivity to other purposes.

Commercial arterials and freight corridors should not be considered for other community uses and on-street parking should not be compromised under this policy.

Policy 9.34 Sustainable freight system. Support the efficient delivery of goods and services to businesses and neighborhoods, while also reducing environmental and neighborhood impacts. Encourage the use of energy efficient and clean delivery vehicles, and manage on – and off –street loading spaces to ensure adequate access for deliveries to businesses, while maintaining access to homes and businesses.

To further ensure a sustainable freight system, in addition to current policy, consider including policies such as:

- Limit the number of housing units on freight routes.
- Maintain capacity for vehicular movement (auto and freight) on arterials and place bike lanes on parallel low traffic streets to avoid modal conflicts and traffic diversion into neighborhoods while ensuring public safety.
- Freight has few alternative routes and should be prioritized on arterials as a result.
- Make greater investments in freight infrastructure to reduce travel times and improve access to industrial land.
- Monitor freight travel time and mitigate for delays by offsetting policies that hinder the efficient movement of goods with projects that remove bottlenecks and deficiencies along freight routes.

Policy 9.39 Automobile transportation. Maintain acceptable levels of mobility and access for private automobiles while reducing overall vehicle miles traveled (VMT) and negative impacts of private automobiles on the environment and human health.

The need to ensure portal capacity for vehicular movement (auto and freight) at freeway on-ramps and off-ramps and at bridgeheads should be called out in policy currently absent from this section.

Parking Management

Policy 9.50 On-street parking. Manage parking and loading demand, supply, and operations in the public right of way to encourage safety, economic vitality, and livability. Recognize that the curb zone is a public space, and as such, a physical and spatial asset that has value and cost. Allocate and manage on-street parking and loading within the curb zone in a manner that achieves the highest and best use of this public space in support of broad city policy goals and local land use context.

Our economic vitality is dependent on existing on-street parking and loading and unloading zones. Public right of way must be reserved for these uses that support adjacent businesses.

Policy 9.51 Off-street parking.

Parking promotes the economic vitality of businesses located in centers and corridors. On-street and in some cases off-street parking (i.e. Smart Park Garages) is also a critical revenue source for the city of Portland's own Bureau of Transportation. Reducing the number of parking spots would further decrease the city's revenue at a time when it seeks more funding from taxpayers through a transportation user fee. Policies that limit new parking opportunities or regulate parking for the purpose of encouraging lower rates of car ownership should not be included.



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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). 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. A strong transportation network is absolutely critical to growing middle-income jobs for our region's residents. Our transportation system needs to promote the efficient movement of goods in order to support our traded-sector economy. Our Value of Jobs studies have found that traded-sector jobs produce higher wages that in turn raise more revenue for critical public services such as education and law enforcement.

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. With limited system capacity and funds, we need to be strategic when crafting transportation policies and investing in projects to ensure a well-functioning multi-modal system. Projects and policies must be evaluated holistically and trade-offs considered when making investment decisions among a variety of modes. We, therefore, appreciate the addition of economic benefit criteria for opportunity access, freight access and freight mobility to help prioritize projects that provide the greatest return on investment and offer the greatest opportunity for quality middle-income jobs.

While we understand that it is not an exact science, we are concerned about the significant gap in financial resources proposed among different modes and the overwhelming commitment of resources to active transportation, specifically. Such a vast difference infers a prioritization of modes as opposed to projects and a shift away from a multi-modal system that would encourage job growth, livability and prosperity.

We would like to review the Portland Bureau of Transportation's (PBOT) citywide transportation capacity analysis to better understand gaps in the existing network but also determine future system needs given population growth projections. We need to ensure that projects that are included in the TSP fulfill not only neighborhood-level needs but the demands of our citywide transportation system and its role in connecting the greater Portland-metro region over the next 20 years.

We understand that the demand for transportation improvements continue to far exceed existing funding resources. As a result, those projects that demonstrate the greatest potential return for the least investment should be prioritized. For example, projects that add traffic lights and synchronize

Greater Portland's Chamber of Commerce

signals help improve traffic flow at a comparatively low cost and should therefore be prioritized (e.g. project numbers 20002, 20016, 20017, 20018, 20073, 20104, and 20105).

In addition to the aforementioned central city projects, we recommend the following:

Central City Project Priorities:

- **TSP 20027 (I-405/US26/Ross Island Bridge, SW):** Construct new freeway access from Ross Island Bridge to I-405 and US 26 to improve connections between regional facilities and separate traffic from neighborhood streets.
- **TSP 20050 (Southern Triangle Circulation Improvements):** Improve local street network and regional access routes in the area between Powell, 12th, Willamette River, railroad mainline, and Hawthorne Bridge. Improve freeway access route from CEID to I-5 SB via the Ross Island Bridge.
- **TSP 20075 (Water/Stark Corridor Improvements):** Construct the multimodal transportation enhancements laid out in the Central Eastside Street Plan.
- **TSP 113230 (Sullivan's Gulch Trail, Phase 1):** Construct a multi-use trail for pedestrians and bicycles within the Banfield (I-84) Corridor from the Eastbank Esplanade to NE 21st Avenue.

Freight Project Priorities:

Based on our review of the TSP freight project list we recommend the following projects be prioritized for funding:

- **TSP 30084 (Columbia Blvd/Columbia Way Bridge Replacement):** Replace the existing structurally deficient Columbia Blvd bridge (#079) over Columbia Way.
- **TSP 30005 (Columbia Blvd/Railroad Bridge Replacement):** Replace the existing fracture critical Columbia Blvd bridge (#078) over railroad with a new structure, and perform seismic upgrades on parallel bridge (#078A).
- **TSP 10011 (Freight Priority Program):** Improve freight speed, reliability, safety, and access along major freight routes to include signal priority, freight-only lanes, queue jumps, loading zones, and turning radius improvements.
- **TSP 50016 (Airport Way ITS):** Install needed ITS infrastructure to include communication network, new traffic controllers, CCTV cameras, and vehicle /pedestrian detectors.
- **TSP 30038 (Marine Drive ITS):** Install CCTV at N Portland Rd and changeable message signs at Portland Rd, Vancouver and 185th.
- **TSP 20002 (I-405 Corridor ITS):** ITS improvements at six signals between Clay and Glisan including communications infrastructure; closed circuit TV cameras, variable message signs for remote monitoring and control of traffic flow.
- **TSP 116590 (Rivergate Blvd Overcrossing):** Build a grade-separated overcrossing of N Rivergate Blvd.
- **TSP 40009 (NE 47th Ave Corridor Improvements):** Widen and reconfigure intersections to better facilitate truck turning movements to the cargo area located within the airport area.
- **TSP 40061 (Columbia/MLK Intersection Improvements):** Complete the unfunded project segment: northbound MLK to eastbound Columbia Blvd.

- **TSP 40102, Columbia Blvd Street Widening (Widen Columbia Blvd to a five-lane cross-section 60th-82nd):** This project has been identified as a bottleneck area on a Major City Traffic Street/Priority Truck Street. It would leverage other recent improvements on Columbia Blvd.
- **TSP 103750 (Cathedral Park Quiet Zone):** Add the city as a co-lead agency and move the project to the major city projects list.

Other Agency Project Priorities:

The Alliance also supports the inclusion of other agency projects to signify the city of Portland's partnership and future coordination with other agencies including the Port of Portland and the Oregon Department of Transportation:

- **TSP 30039 (Marine Drive Rail Overcrossing):** Reroute rail tracks and construct an above-grade rail crossing at Rivergate West entrance to improve safety and reduce vehicle and rail traffic conflicts.
- **TSP 30069 (Columbia Slough Rail Bridge):** Construct a rail bridge across Columbia Slough to provide rail connection to South Rivergate from Terminal 6.
- **TSP 103780 (T6 Internal Overcrossing):** Construct an elevated roadway between Marine Drive and Terminal 6.
- **TSP 108840 (I-5/Broadway/Weidler Interchange, Phase 2):** Acquire right-of-way to improve safety and operations on I-5, connection between I-84 and I-5, and access to the Lloyd District and Rose Quarter.
- **TSP 116540 (Time Oil Road Reconstruction):** Reconstruct Time Oil Road to improve industrial land access in South Rivergate.

Recommended Studies:

The Alliance would also like to see the following studies initiated and completed within the next five years:

- **Freight Master Plan Update:** Incorporate freight-related studies and other projects that were initiated after the FMP was adopted in 2006.
- **Transportation System Capacity Analysis:** Evaluate impacts from reduced freight route capacity from completed and planned projects impacting major freight routes and industrial districts, such as North Interstate Avenue, SE 17th Avenue and NE Sandy Boulevard.
- **Airport Industrial District Truck Assess and Circulation Study:** Evaluate freight system needs in the PDX area.
- **Columbia Corridor Truck/Rail Access and Circulation Study:** Evaluate the interaction between the UP Kenton line and truck access along NE Columbia Blvd and US 30 Bypass.
- **River Transportation Study:** Evaluate the feasibility of river transport including water taxis and other transportation-related boat tours.

While these projects and studies alone will not address all of our transportation needs, they will increase access to vacant and underutilized industrial lands, including traded-sector facilities, while

increasing access to middle-income jobs. They also provide capacity for auto and freight mobility, promote regional connectivity, tourism, and include seismic upgrades that are fundamental for system integrity.

Thank you for your consideration of these comments.

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

