

March 8, 2016

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Ms. Katherine Schultz, Chair
City of Portland Planning and Sustainability Commission
1900 SW Fourth Avenue, Suite 7100
Portland, OR 97201

Re: Proposed Transportation System Plan

Dear Chair Shultz and members of the Planning and Sustainability Commission (“PSC”):

This office represents Providence Health & Services—Oregon (“Providence”). I am writing on behalf of Providence to comment on the review draft dated December, 2015 of the Transportation System Plan (“TSP”).

Providence has the following comments on TSP Section 14: “Transportation & Parking Demand Management” (**Exhibit 1**).

1. The commentary for Section 14, page 1 describes the purpose of a TDM. Providence has a very successful TDM in effect for Providence Portland Medical Center (“PPMC”). (**Exhibit 2**, Executive Summary of Transportation Plan for PPMC). As the chart on page 5 of the Executive Summary shows, Providence has reduced the percentage of single occupancy vehicle trips (“SOV”) to PPMC from 85 percent in 1996 to just 66 percent in 2014, the last full reporting year. This shows that PPMC’s TDM, approved by the City of Portland in the 2012 Conditional Use Master Plan (“CUMP”) for PPMC, continues to be successful in implementing the goal of reduced SOV trips. Therefore, Providence believes that Portland City Code Titles 33 and 17 should provide for continued use of a successful TDM.

2. Proposed Portland City Code Title 17 amendments at Section 15, page 3 do not explain what is required for an approvable TDM. Providence has provided this same testimony to the PSC in the past (**Exhibit 3**).

3. Title 17 proposes that the TDM be implemented through an administrative rule consistent with Portland City Code Titles 17 and 33. The administrative rule has not been drafted. It is impossible to be comfortable with the TDM process that will be implemented by an administrative rule when the administrative rule has not been drafted and is unavailable for public review.

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Additionally, an administrative rule can be easily changed. While this flexibility has advantages, it also has disadvantages because the review and approval process is quite different than if the TDM requirements were in Title 33.

4. The Title 33 language recommended to the Portland City Council by the PSC at its January 29, 2016 meeting includes PCC 33.852.115 (Exhibit 4). This language provides:

“Duration of a Transportation Impact Review. An approved Transportation Impact review remains in effect for ten (10) years or until development allowed by the review has been completed whichever occurs first”.

As explained by City staff to Providence, this means that Providence could apply for one Transportation Impact review and TDM if it included all of its proposed parking space and building improvements for the ten (10) year period in one application. However, if Providence were to do that, the process would be about the same as the current CUMP process, which means Providence is treated less like a permitted use in the CI-2 zone and more like a conditional use.

Providence requests that the PSC leave the record open for further testimony on the TSP until it, other institutions, and City staff have been able to have additional discussions about how a TDM is triggered and what may be used to satisfy the TDM requirement.

Very truly yours,



Michael C. Robinson

MCR:GHS
Enclosures

cc: Ms. Michelle Bernard (via email) (w/ encls.)
Mr. Jeff West (via email) (w/ encls.)
Ms. Karen Weylandt (via email) (w/ encls.)
Ms. Dana White (via email) (w/ encls.)
Ms. Julia Kuhn (via email) (w/ encls.)
Ms. Marty Stiven (via email) (w/ encls.)

**City of Portland
Transportation System Plan**

**Proposed Draft
December 18, 2015**

**Section 14:
Transportation & Parking
Demand Management**

Commentary

Transportation and Parking Demand Management, also known as TDM, encompasses a variety of strategies to encourage more efficient use of the existing transportation system by reducing reliance on the personal automobile. This is achieved by encouraging people through education, outreach, financial incentives, and pricing to choose other modes, share rides, travel outside peak times, and telecommute, among other methods. Effective transportation demand management also incorporates management of parking supply and demand. TDM strategies help reduce traffic congestion, reduce the amount of money that must be spent to expand transportation system capacity, improve air quality, and ensure road capacity is available for those who need it most.

For example, employers can provide a reduced cost transit pass to employees, increasing transit use, reducing traffic congestion, and saving employees the cost of driving and parking. Apartment building property managers can provide tenants transit or bikeshare incentives, increasing the number of car-free households and reducing neighborhood parking and traffic impacts.

Transportation demand management and parking demand management are complementary, synergistic strategies. Doing a good job with one helps the other succeed; doing a good job with both can significantly improve the economic and environmental benefits for both residents and businesses. See page 16 for an update on the link between the Centers and Corridors Parking Project and TDM.

According to recent modeling work by the City, a strong and effective TDM program is one of the most important current strategies to moving toward meeting our traffic, access, and climate goals.

The focus of Portland's current TDM upgrade is to improve the effectiveness of transportation and parking demand management requirements for mid-to-large scale development.

In collaboration with the Bureau of Planning and Sustainability's comprehensive plan implementation projects, this TDM upgrade will:

- 1) Clarify and standardize performance-based requirements to reduce traffic and automobile parking demand at campuses and institutions, primarily those sites owned and managed by organizations with properties in the proposed **Campus Institutional Zones** and other large institutions;
- 2) Clarify and standardize performance-based requirements to reduce traffic and auto parking demand from development covered by **conditional use permits and master plans**;
- 3) Establish new standards to reduce traffic and auto parking demand from mixed-use development over certain thresholds, specifically those covered by the proposed **Mixed Use Zones** project;
- 4) Establish new standards to reduce traffic and auto parking demand from development in **Central City Plan District mixed use and employment zones** over certain thresholds.

This proposal distinguishes between **discretionary and by-right permits**, allowing by-right applicants to choose a pre-approved TDM plan or to develop a custom plan. Discretionary permits tend to cover larger or more sensitive sites, and are thus more likely to result in a custom TDM plan.

PBOT is proposing to establish a new section in Title 17, 17.106, "Transportation and Parking Demand Management," to standardize Transportation and Parking Demand Management Plan requirements (see next page). The zoning code, Title 33, will establish TDM plan thresholds and reference 17.106. Administrative details would be included in a new administrative rule developed and adopted in 2016.

17.106 Transportation and Parking Demand Management

17.106.010 Purpose.

Providing residents, employees, and visitors information and incentives to walk, bicycle, ride transit, carpool, and otherwise reduce the need to own and use automobiles can be a relatively quick, inexpensive, and effective strategy to achieve city goals and prevent traffic and parking impacts. Requiring transportation and parking demand management (TDM) is intended to prevent, reduce, and mitigate the impacts of development on the transportation system, neighborhood livability, safety, and the environment while reducing transportation system costs.

17.106.020 Required Elements of a Transportation and Parking Demand Management Plan. A TDM Plan shall include, at a minimum, the following elements:

- A. Site and proposed development descriptions; baseline information and analysis, including proposed auto and bicycle parking;
- B. Performance Targets;
- C. TDM Strategies likely to achieve the performance targets;
- D. Automobile parking demand reduction strategies;
- E. Performance Monitoring plan;
- F. Ongoing participation and Adaptive Management plan;

17.106.030 Approval Required.

The TDM Plan, approved in writing by the Portland Bureau of Transportation, is required prior to development approval.

17.106.040 Ongoing Participation.

The development shall be required to commit to ongoing participation in the TDM Plan in its deeds, Codes, Covenants, and Restrictions.

17.106.050 Enforcement and Penalties.

It shall be a violation of this Chapter for any entity or person to fail to comply with the requirements of this section or to misrepresent any material fact in a document required to be prepared or disclosed by this Chapter. Any building owner, employer, tenant, property manager, or person who fails, omits, neglects, or refuses to comply with the provisions of this Chapter shall be subject to a civil penalty of up to \$1,000 for every 7 day period during which the violation continues.

17.106.060 Administrative Rule Authority.

City Council authorizes the Director of the Bureau of Transportation to adopt administrative rules for Transportation and Parking Demand Management consistent with City codes Title 33 and Title 17.

17.106.070 Fees.

The City may charge fees for Transportation and Parking Demand Management goods and services provided, including but not limited to application review, incentives and education, performance monitoring, adaptive management, and compliance and enforcement.

Commentary

In general, TDM plans will be required for development:

- In Campus Institutional Zones (discretionary TDM plans);
- In Mixed Use Zones (pre-approved TDM plans);
- In Central City Plan District office employment zones (pre-approved TDM plans);
- Requiring approval(s) that currently specify a transportation or parking management plan.

For proposed Title 33 code amendments, please see the Campus Institutional Zoning Update Project draft proposal (<https://www.portlandoregon.gov/bps/63692>), the Mixed Use Zones Project draft proposal (<https://www.portlandoregon.gov/bps/63621>), and the Central City 2035 project (<https://www.portlandoregon.gov/bps/article/304042>).

In addition, BPS and PBOT will develop amendments updating other sections in Title 33 which currently reference transportation or parking demand management to ensure consistency of TDM plan requirements.

Below is a general TDM update timeline.

2015-16	2016	Future
<p>Proposed Draft (this document)</p> <p>Code Changes (Title 33 and Title 17 changes)</p> <ul style="list-style-type: none"> • Campus & Institution • Mixed Use Zones • Central City residential and employment sites • Standardize language in Title 33 sections that have transportation and parking demand management references • Add TDM section to Title 17 <p>Thresholds (Title 33 changes)</p> <ul style="list-style-type: none"> • Number of units or parking spaces • Square footage <p>Administrative Rule</p> <ul style="list-style-type: none"> • Council authorization 	<p>Planning & Sustainability Commission on Proposed Draft and City Council hearings on Recommended Draft</p> <p>Administrative Rule</p> <ul style="list-style-type: none"> • Develop detailed language <p>Implementation Preparation</p> <ul style="list-style-type: none"> • Clarify staff roles & responsibilities, including who is eligible to provide TDM services • Develop and publicly review fee proposal • Enhance tracking and reporting system • Develop promotional materials • Ensure staffing 	<p style="text-align: center;">2017</p> <p>Implementation</p> <ul style="list-style-type: none"> • Test application and review process • Develop applicant forms and information • Train staff and frequent applicants • Consider expanding TDM plan requirements to multifamily residential zones <p style="text-align: center;">2018</p> <p>Refinement</p> <ul style="list-style-type: none"> • Consider expanding TDM plan requirements to large commercial development outside Central City. • Performance reporting • Applicant and neighborhood feedback • Adjustments as needed

Another view of the flow from high level to specific details is shown on page 6.

Title 17 Amendment

December 18, 2015

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Commentary

TDM Plan Development Process

High Level ("Trees") TSP Stage 1	Medium Level ("Shrubs") TSP Stage 2	Details ("Groundcover") Implementation
<p>Comprehensive Plan and Transportation System Plan establish the policy support for TDM (goals, policies, objectives). City Council is holding public hearings on these elements in December 2015 and January 2016.</p>	<p>Title 33 (zoning code) establishes the type and size of development requiring a TDM plan. Title 17 establishes TDM plan required components. Planning & Sustainability Commission hearings start in February 2016.</p>	<p>Administrative Rule establishes details for TDM plans, such as service provider options, performance targets and multimodal financial incentive levels. Administrative rule development and stakeholder engagement initiated in 2016.</p>

Who might provide each TDM service?

TDM plan review	City
Establish project in tracking system	City
Provide education & information materials	City
Provide multimodal financial incentive	City, other public agency, Transportation Management Association (TMA), building manager, or other City-certified organization
Conduct employee/resident surveys	City, other public agency, Transportation Management Association (TMA), building manager, or other City-certified organization
Work with building to ensure compliance, and implement adaptive management plan if performance falls below targets	City, other public agency, Transportation Management Association (TMA), building manager, or other City-certified organization
Conduct enforcement, if building fails to participate	City
Produce annual TDM program reports	City

Draft TDM Administrative Rule Outline

TRN - xx.xx Transportation and Parking Demand Management Standards for Development

1. Purpose
2. Required Elements of a Transportation and Parking Demand Management Plan
3. Performance Targets
4. Site Improvements
5. Education & Information
6. Multi-modal Financial Incentives
7. Transportation Coordinator/Service Provider
8. Ongoing Participation
9. Performance Monitoring
10. Adaptive Management
11. Compliance & Enforcement
12. Approval Criteria (if needed)
13. Fees

Title 17 Amendment

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Commentary

Outstanding Questions: There are several outstanding questions which will be decided in 2016, including those below. Decisions on these elements are likely to be incorporated into the Administrative Rule and/or Pre-Approved TDM Plan. We welcome comments on the following:

- **Service delivery:** who should provide TDM services, such as delivery of transit passes and bikeshare membership benefits, to residents and tenants/employees in buildings with a TDM plan? Options include City staff, Transportation Management Associations (TMA's), and organizations certified by the City;
- **TDM Plan Duration:** Should the TDM plan requirements be in effective for 10 years, 20 years, 30 years, life of building?
- **Ongoing participation:** How to ensure the TDM plan requirements run with the property, regardless of ownership?
- **Performance Targets:** What are the appropriate mode share and auto ownership performance targets for different areas of the city? Areas with different zoning designations, land use and transportation characteristics, described as "pattern areas" in the comprehensive plan, chapter 3.
- **Site Improvements:** Should site improvements, such as bikeshare stations or lockers and showers, be required? If so, do they belong in Title 33 or the TDM Pre-Approved Plan?
- **Multimodal Financial Incentive:** What elements should be required in a Multimodal financial incentive, e.g. bike and walk bucks as an option to a transit pass? What is the optimum amount and duration for a financial incentive?
- **Responsible Party:** Who should be responsible for employee multimodal incentives, the building owner/manager or the employer?
- **Affordable Housing:** Should qualified affordable housing projects be required to have a TDM plan? To provide multimodal financial incentives to tenants? What methods could we use to reduce costs to building owners while providing multimodal incentives to residents of affordable housing projects? Affordable housing tenants tend to have lower automobile ownership rates and to be more transit dependent, so would disproportionately benefit from receiving multimodal incentives. The intent would be to reduce overall housing + transportation costs for building management and residents.
- **Transportation System Development Charges:** Can projects providing multimodal financial incentives receive a credit on their TSDC charges?
- **Adaptive Management:** Should buildings that consistently fall below performance targets be required to expand multimodal financial incentives to improve performance? If so, under what circumstances?
- **Compliance and Enforcement:** PBOT prefers working with building owners to ensure they have the resources they need to be successful. How should we establish an effective "compliance" program to limit enforcement to only those buildings that choose not to meet the ongoing participation requirement?
- **TDM for Existing Buildings:** Is there a method to fund TDM programs for existing buildings, particularly low income building residents?
- **Relationship to Parking Requirements:** We received multiple comments requesting that we integrate parking and TDM requirements. How do we best do so?
- **Fees:** Should the City charge one larger, up-front fee at the time of development review for application review and ongoing performance monitoring, or a smaller fee at the time of development review (only for application review) plus a small fee each time performance reports are reviewed and if adaptive management, compliance and enforcement are required?

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Commentary

Draft TDM Pre-Approved Plan for By-Right Development (The Outstanding Questions on prior commentary page will be addressed and specific details determined with development of the administrative rule in 2016)

1. Application Information

Applicant(s): _____

Contact Information: _____

Development Site Address or Location: _____

Site tax account numbers: _____

2. Project Description (focus on the topics below; form will be revised to meet BDS needs)

Project Description (include site and building square footage by use, number of residential units, proposed auto parking stalls, proposed short term and long-term (secure) bike parking and parking types, other bicycle facilities): _____

Approvals Required: _____

3. Performance Targets

The project shall achieve the following performance targets:

- Area-specific mode share targets provided by the City, based on Portland's adopted 70% citywide non-SOV mode share target, modified to reflect land use patterns and travel options, pro-rated over time.
 - Commute Non-Auto Mode Share (employment only)
 - Daily Non-Auto Mode Share (residential only)
- Auto Ownership (residential only) target could average ~ 30% and will reflect land use patterns, projected growth, and available travel options)

Regular monitoring to gather data and track ongoing participation:

- Frequency and duration of monitoring (every year, 5 years, etc.)

4. **Site Improvement:** Building owner (select one or encouraged) to implement one or more physical site improvements. The intent is to offer incentives for building owners to build improvements, including the following, which go above and beyond minimum code requirements:

- Transit supportive plaza
- Bike sharing station
- Carpool and carshare vehicles

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Commentary

5. Education & Information Requirement

- Offer every new resident within x weeks of move-in the opportunity to order free PBOT-approved TDM materials to tenants at move-in and to employees at hire. Information includes but is not limited to transit schedules and system maps; bicycle infrastructure information and maps; building bicycle facilities; pedestrian infrastructure and maps; carpool and car sharing resources.
- Deliver information and conduct conversations with participants about transportation choices and information requested.
- Send personalized follow-up communications with targeted messaging based on materials ordered and/or conversations to continue reinforcing transportation choices.
- Offer an order form reminder to all new residents that have not ordered transportation information.
- Send 2-4 newsletters highlighting community events, active transportation opportunities, and healthy living information.
- Continue quarterly communications promoting transportation choices to participants who elect to continue to receive.
- Conduct at least two guided walks highlighting the active transportation network and neighborhood amenities that support healthy living for the building residents and/or in collaboration with other buildings in the area. Alert building residents about the clinic.
- Conduct at least two guided bicycle rides highlighting the active transportation network and neighborhood amenities that support healthy living for the building residents and/or in collaboration with other buildings in the area. Alert building residents about the clinic.
- Conduct at least two bicycle repair, safe riding, and/or trip planning clinics in the building and/or in collaboration with other nearby buildings. Invite building residents to the clinics.

6. Advertising Requirement (discuss whether or not this would produce results)

Provide PBOT-approved advertising for no-car and low-car households on building website and any other building advertising.

7. Transportation Coordinator/Service Provider

Building owner shall engage a PBOT-certified service provider or PBOT to conduct transportation management activities. Please identify your service partner:

- PBOT
 Other

If Other please document the company or organization's expertise to provide this service.

7. Multimodal Incentive Requirement

Building owner(s) shall offer financial incentives to new residents and/or employees (pro-rated by full-time equivalency) equal to the value of a TriMet pass for at least the first one – six (to be determined) month(s) of their tenancy/employment. Each new resident or employee shall be offered a choice to use this multimodal incentive for one or more of the following:

- TriMet pass
- Portland Streetcar pass
- Portland Bikeshare membership and/or use credits
- Bicycle & Walk Bucks (for use to purchase bicycling and walking gear)

8. Automobile Parking

Title 17 Amendment

Building owner(s) shall "unbundle" the cost of any automobile parking from leases so that end users pay the area market price, or a minimum of \$__ per (day/week/month) for an automobile parking stall.

Commentary

9. Performance Reporting

Building owner(s) shall provide a performance report on the schedule in section 3, above, meeting the minimum requirements in TRN 10.xx (administrative rule section covering questions to be asked, when survey will be done, survey response rate, etc.)

10. Adaptive Management

If the building does not meet one or more of the performance targets in section 3, the building owner(s) agrees to the following until PBOT-verified Performance Reporting shows the building meeting all performance targets: extend multimodal incentives equivalent to 50% of the current TriMet retail annual pass cost to all current residents and employees (pro-rated to full-time equivalency). The building owner(s) may choose to provide an annual performance report in non-required years.

11. Ongoing Participation

Building owner(s) agree to ongoing funding to meet the requirements of this plan and TRN 10.xx (administrative rule section covering by right TDM plans) for 20 years from building certificate of occupancy. TDM plan ongoing participation shall be recorded on the title with the county in which the building is located.

12. Enforcement

Building owner(s) acknowledges and accepts the enforcement provisions for a TDM Plan in Title 17.106.060, Enforcement and Penalties.

13. Signature and date blocks

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EXHIBIT 1
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Commentary

Centers & Corridors Parking and Transportation Demand Management

Portland's Centers and Corridors Parking Project has recommended an expanded residential permit parking system as a tool to better manage parking in mixed use areas and surrounding residential neighborhoods. City staff worked with a Stakeholder Advisory Committee throughout 2015 to develop the project recommendations.

The committee recommended capping the number of permits issued in each permit area, to ensure that parking does not become completely saturated, and to provide enhanced TDM services in areas that opt-in to the permit system. The committee also recommended factoring the cost of TDM services into the base price of a parking permit (in addition to the cost of administration and enforcement) and to develop an escalating fee structure, where the 2nd permit issued to the same address costs more than the 1st, etc. The additional revenue would be dedicated to providing TDM services in the area, with a focus on residents and businesses that do not have access to permits, either because they are outside the permit area, or because no permits are available because the cap has been reached. Staff anticipates bringing the recommendations to City Council in early 2016.

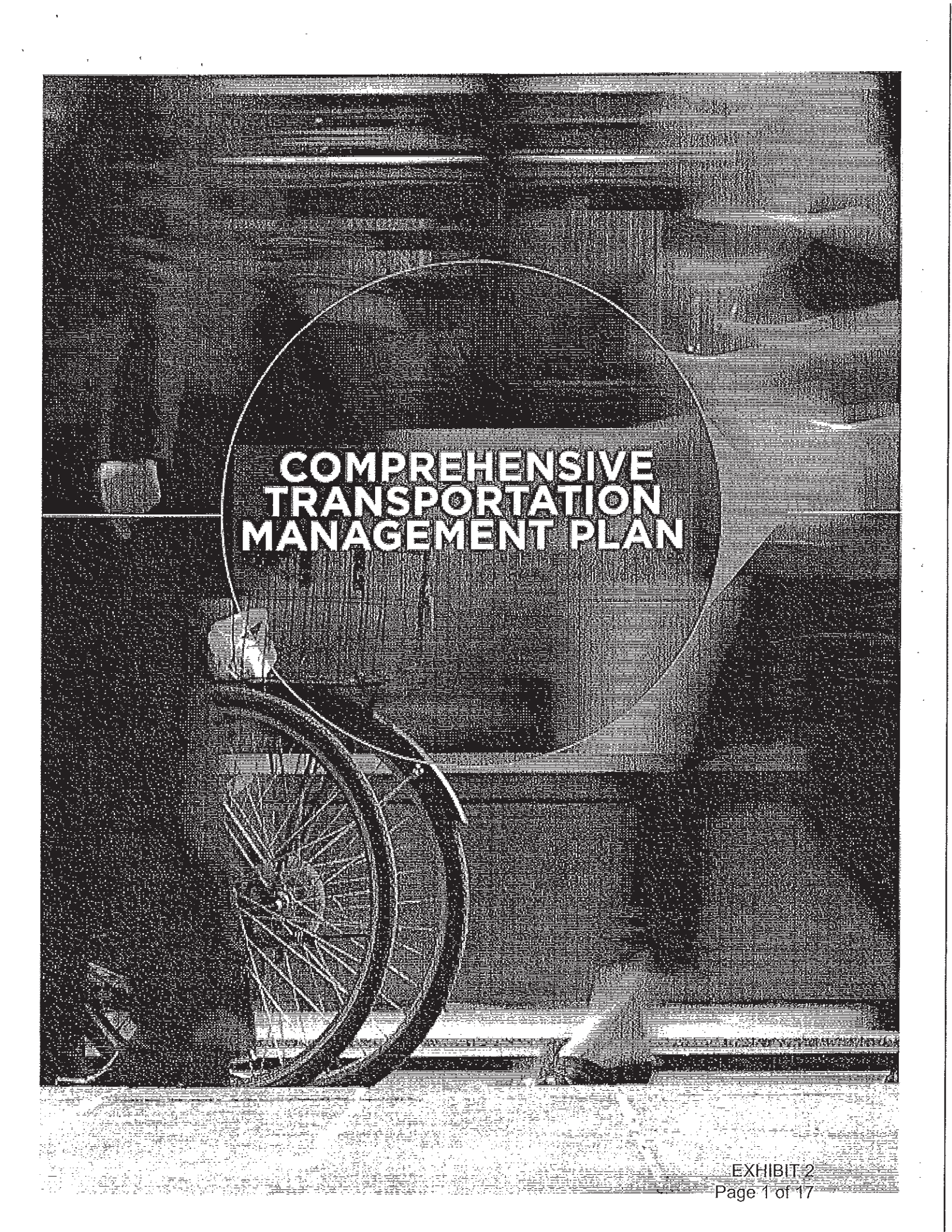
How Does Portland TDM Compare With Other Cities and Counties?

To inform our work on TDM proposals, City staff researched TDM best practices in other US cities and counties. The chart below summarizes key elements of other agencies' programs. These charts are a high level overview lacking implementation details. The first chart summarizes other agency requirements for new multi-family and mixed use development.

TDM Requirements Summary - Residential						
Agency	Incentive Duration	Incentive Amount	Service Provider	Fee	CC&R/ Deed	Performance Monitoring
Portland, OR						
Arlington County, VA	One time at initial occupancy	\$70	Municipality	Annual review		X
Berkeley, CA	Ongoing for building life	\$100/year	TMA			X
Boulder, CO	3 years	up to \$120/month	Developer			X
Contra Costa County, CA	Ongoing for building life	\$100/year	Property Owner		X	X
Pasadena, CA	Ongoing for building life	Specified by applicant	Property Owner	Initial and annual review	X	X
Redmond, WA	One time at initial occupancy	\$117	Owner or TMA		X	X
Rockville, MD	Specified by applicant	Specified by applicant	Developer	Initial	X	X
Santa Monica, CA	Ongoing for building life	\$55-\$110/month	TMO/A	Annual review		X

The second chart, below, summarizes other agency requirements for new employment development.

TDM Requirements Summary - Employer						
Agency	Incentive Duration	Incentive Amount	Service Provider	Fee	CC&R/ Deed	Performance Monitoring
Portland, OR						
Arlington County, VA	One time at initial occupancy	\$70	Municipality	Annual review		X
Bellevue, WA	Ongoing for building life	\$15/month	Property Owner		X	X
Berkeley, CA	Ongoing for building life	\$100/year	Employer or TMA			X
Boulder, CO	3 years	up to \$120/month	Employer			X
Cambridge, MA	life of special permit	Specified by applicant	TMA			X
Contra Costa County, CA	Ongoing for building life	\$100/year	Property Owner		X	X
Pasadena, CA	Ongoing for building life	Specified by applicant	Property Owner	Initial and annual review	X	X
Rockville, MD	Specified by applicant	Specified by applicant	Developer	Initial	X	X
Sacramento, CA	Specified by applicant	\$50-\$100/month	Employer			X
Santa Monica, CA	Ongoing for building life	\$55-\$110/month	TMO/A	Annual review		X



**COMPREHENSIVE
TRANSPORTATION
MANAGEMENT PLAN**

PROVIDENCE'S VISION

CREATING HEALTHIER
COMMUNITIES

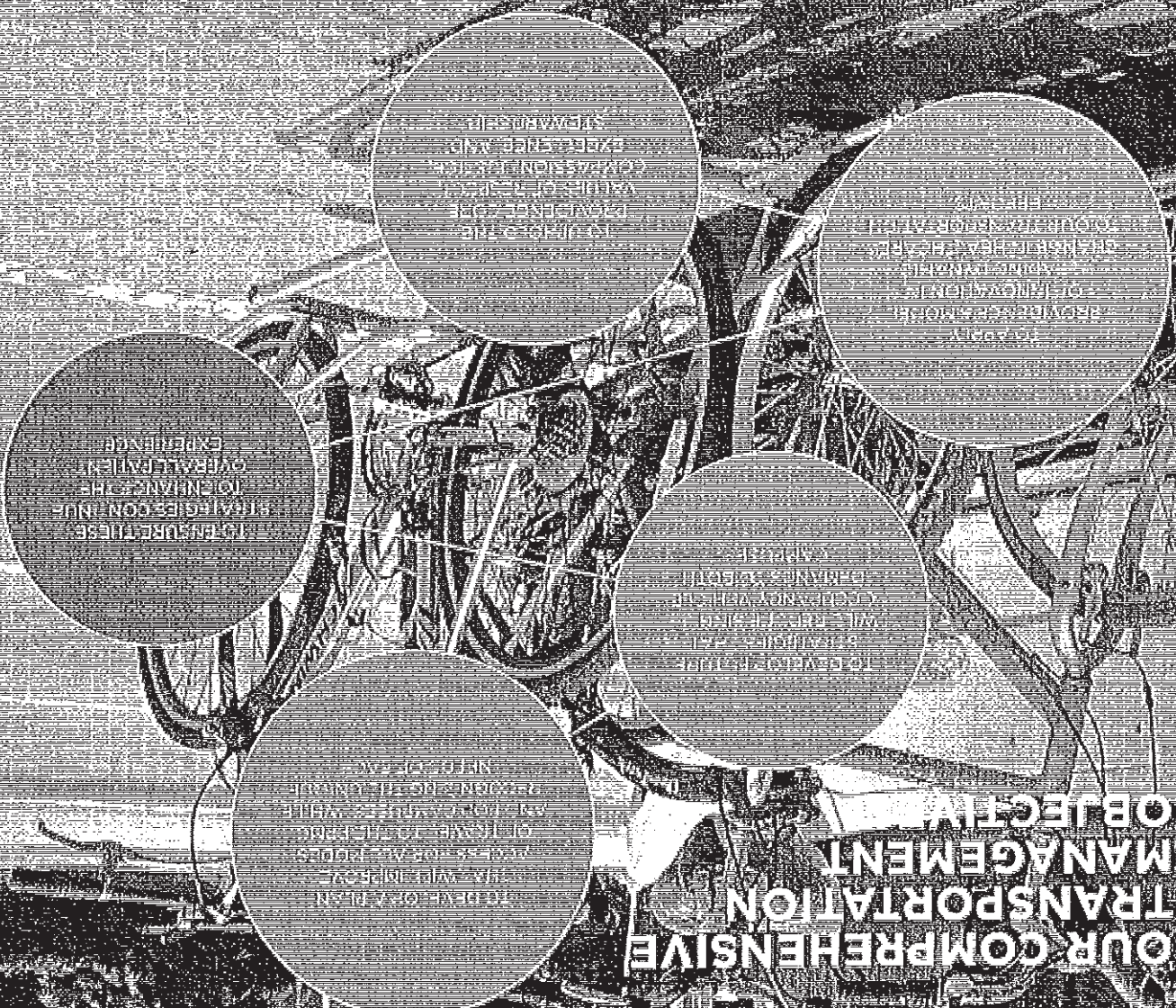
PROVIDENCE'S MISSION

As people of Providence, we reveal God's love for all, especially the poor and vulnerable through our compassionate service.

Providence Health & Services is a not-for-profit health system committed to providing for the needs of our communities across Alaska, California, Montana, Oregon, and Washington. With a system of over 76,000 caregivers, we strive to provide compassionate care to our patients in places of healing ranging from large hospitals and medical centers to private residential homes. In creating places of healing, we strive to minimize our impact to those who live near our campuses by developing trusting and lasting relationships with our community partners as we continue to expand our care to those who need it most.

This Comprehensive Transportation Management Plan (CTMP) exemplifies our vision to create healthier communities by identifying ways we can continue to reduce single-occupancy vehicle trips to our Providence Portland Medical Center (PPMC) and Providence Office Park (POP) campus through both education and the creation of alternative transportation resources. As stewards of our environment, we have developed this CTMP in the hope of influencing how our employees, visitors, and staff frequent our campuses. Additionally, we hope this plan continues to bridge our relationships between our communities as strategies develop and evolve.

OUR COMPREHENSIVE TRANSPORTATION MANAGEMENT OBJECTIVES



PRINCIPLES THAT GUIDE OUR FUTURE ACTIONS AND DECISIONS

Our CTMP is based on a set of "Guiding Principles" that will help us prioritize how we invest our transportation resources (time and dollars) over time. These principles are based on our commitment to provide our patients, visitors, physicians and employees the ability to walk, bike, ride public transit, ride our shuttle, use carshare or use technology to travel to the PPMC and POP campuses.



Enable users to choose and easily use the mode of travel they desire to access our campuses.



Reduce automobile trips to our campuses by providing alternative options that are convenient and practical.



Provide convenient parking for patients and visitors.



Ensure that access and circulation within our campuses is safe, well lit, and easily understood by all.



Promote transportation options that value sustainability and reduce greenhouse gas emissions.



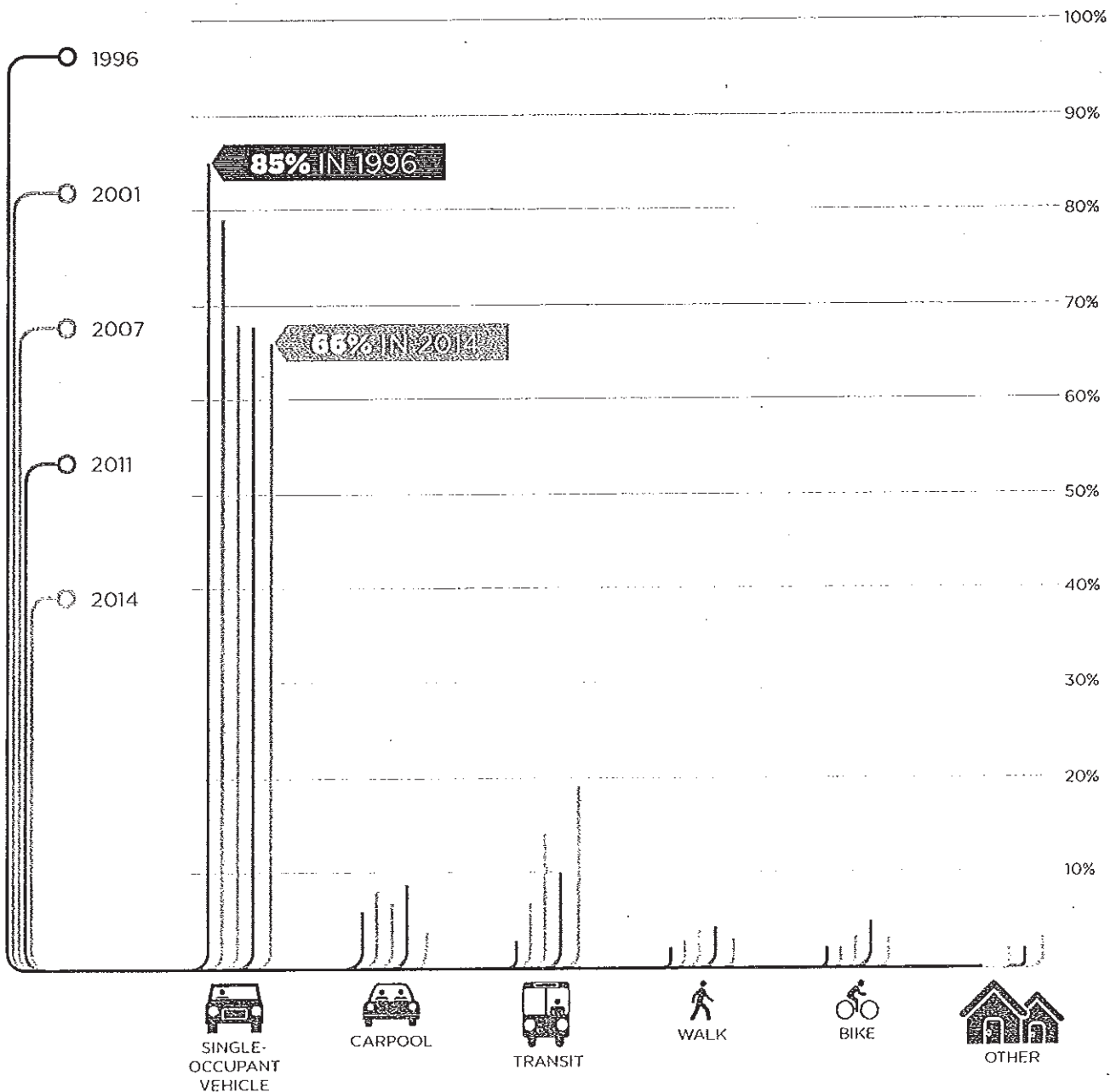
Support transportation options that enhance individual and community health and well-being.



Collaborate with the neighborhoods and the city to provide a transportation system that is convenient, comfortable, and environmentally and fiscally responsible.

WHERE HAVE WE BEEN?

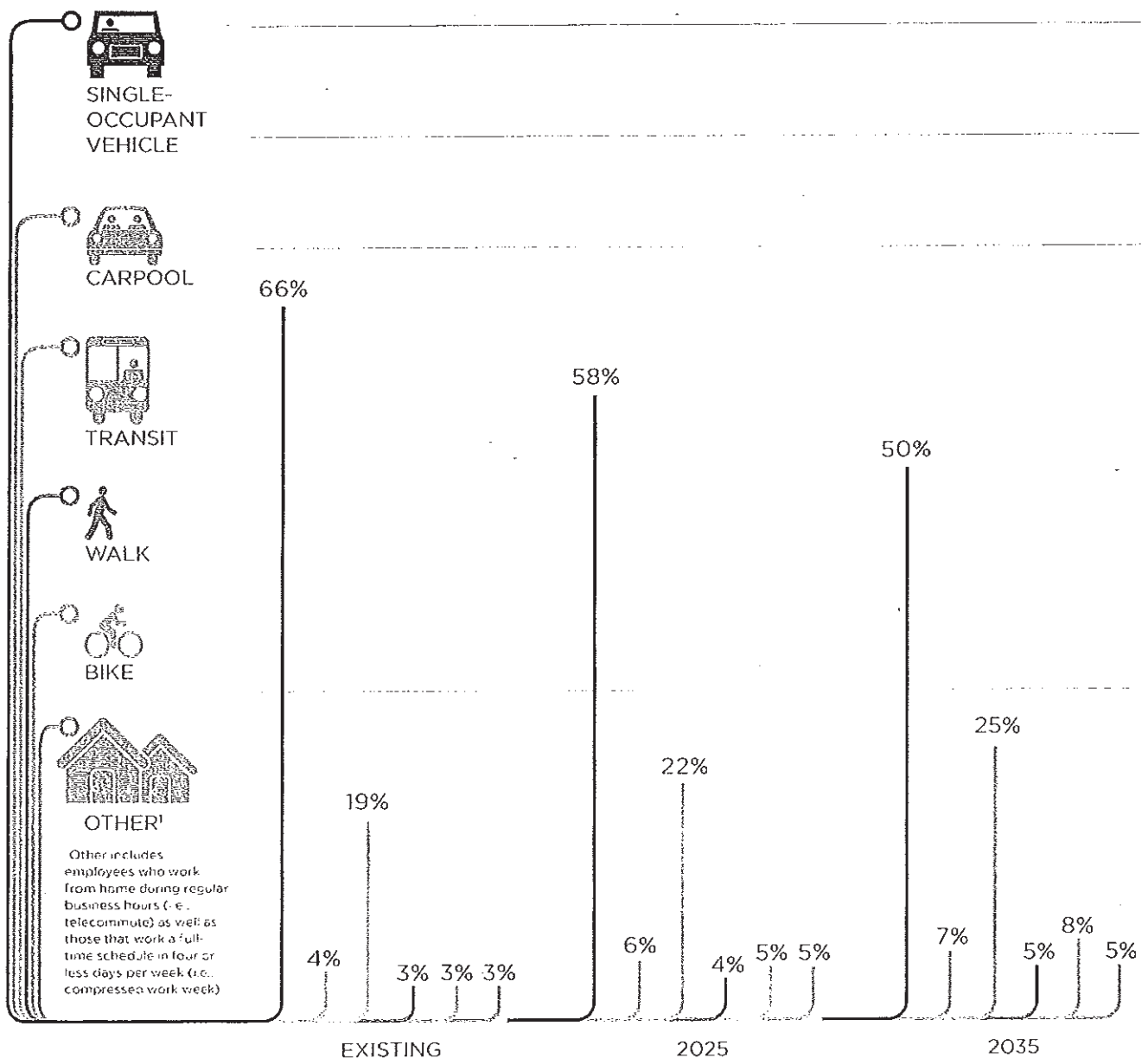
Since 1996, PPMC and POP have made significant progress toward reducing the percentage of people that drive alone to campus from 85% in 1996 to 66% today. This significant reduction in drive alone trips has occurred through collaboration with TriMet and the City of Portland as well as commitments to sustainability by physicians and staff. Despite this progress, a more deliberate approach is needed to continue decreasing auto trips to campus.



HOW WE WILL TRACK OUR PROGRESS

We will use quantifiable targets to help define success of our Plan. Progress moving toward these targets can be measured via the Employee Commute Options (ECO) survey that is administered by the Oregon Department of Environmental Quality and TriMet.

DESIRED MODE SPLIT TARGETS



WHAT DO WE HAVE PLANNED?

Below is a summary of what we are doing now, what we want to begin in the next two years, and what we may consider in the longer term to help us achieve our goals.

CURRENT STRATEGIES	STRATEGIES PLANNED IN THE NEXT TWO YEARS	OTHER MEASURES WE MAY CONSIDER
1. Free TriMet Employee Passes	15. Transit Tracker Displays	21. Bike Sharing Stations
2. Emergency Ride Home Program	16. Bicycle Tune-Up Program	22. Bike Sharing Membership Subsidy
3. Bike/Pedestrian Coordinator	17. Self-Service Bicycle Repair Areas	23. Carsharing Membership Subsidy
4. Preferential Carpool Parking	18. Providence TDM Manager	24. Bicycle Hub
5. Staff Telecommuting Options	19. Dedicated Carsharing Parking	25. Fill Infrastructure Gaps
6. Hollywood Transit Center Shuttle	20. Website Improvements	
7. Electric Vehicle Charging Stations		
8. Cycling Facilities		
9. Reduce On-Street Parking at NE 53rd and Glisan		
10. Provide Neighborhood Hotline		
11. Good Neighbor Agreement		
12. Partner with Neighborhoods on Requests for Transportation Improvements		
13. Provide Valet Parking on the PPMC Campus		
14. Require Annual Parking Permits for Caregivers on PPMC Campus		

WHAT WE ARE DOING NOW

We have a number of current strategies in place on our campuses that we plan to continue.

1. FREE TRIMET EMPLOYEE PASSES



WHAT IT IS:

All Providence employees receive an annual TriMet pass as part of their benefits package.

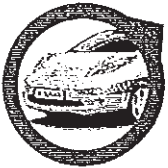
WHAT IT DOES:

Free passes encourage employees to commute by public/mass transit, as there is no out-of-pocket employee cost.

FUTURE PLANS:

Providence will continue to provide this employee benefit.

2. EMERGENCY RIDE HOME PROGRAM



WHAT IT IS:

An employee who commutes by a mode other than via his/her car can receive a free taxi ride from their workplace (within the TriMet district boundary) in case of illness or a family emergency (e.g., sick child at school).

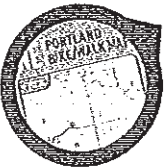
WHAT IT DOES:

The program provides peace of mind for commuters who choose not to drive alone, as they know they can quickly get home in case of illness or family emergency.

FUTURE PLANS:

Providence will continue to provide this employee benefit.

3. PPMC BICYCLE/PEDESTRIAN COORDINATOR



WHO HE/SHE IS:

A designated Providence employee who promotes bicycle and pedestrian commuting to employees in addition to his or her regular duties.

WHAT HE/SHE DOES:

Raises awareness of commuting options among Providence employees. Helps to coordinate activities that incent others to commute via cycling or walking.

FUTURE PLANS:

This role is planned to become a part of the Providence Oregon Transportation Demand Management Manager position.



WHERE DO WE GO NEXT?

We have formed a dedicated team to continue to evaluate, implement and monitor the strategies outlined in the plan. We look forward to working with the community as we continue to refine our plan over time.

TESTIMONY OF MIKE ROBINSON ON BEHALF OF PROVIDENCE HEALTH &
SERVICES – PORTLAND AT DECEMBER 15, 2015 PORTLAND PLANNING AND
SUSTAINABILITY COMMISSION (“PSC”) PUBLIC HEARING ON THE PROPOSED
CI-2 LAND USE REGULATIONS

Good evening, Chair Baugh.

My name is Mike Robinson. My mailing address is 1120 NW Couch Street, Tenth Floor,
Portland, OR 97209-4128.

I am here on behalf of Providence Health & Services-Oregon, which owns and operates Portland
Providence Medical Center (“PPMC”).

I have submitted a letter to the PSC dated today. Please review it before you deliberate and
make a recommendation to the City Council.

Providence appreciates the time that staff has given them and addressed many of Providence’s
issues and we appreciate their assistance and professionalism. There is a lot that is right with the
land use regulations and Providence appreciates that.

Providence would like you to consider two (2) issues:

1. Eliminate the proposed code language that terminates the CUMP before its 2022
expiration date. PPMC’s CUMP is valid through 2022 and Providence wants the CUMP to
remain valid for its entire 10 year period.
2. Eliminate the proposed code language requiring a new Transportation Demand
Management Plan until we have seen how that requirement will be implemented by PBOT.
Providence’s Comprehensive Transportation Plan for PPMC is attached to our letter.

Thank you for your time tonight.

Language to be added is underlined
 Language to be deleted is shown in ~~strikethrough~~

1. The TIA must include build-out of the Maximum Use Allocations in Table 508-1 in the count of background traffic, regardless of whether construction of those uses has occurred;
2. Any approved TIA must be reflected in the BDS tracking report;

D. Traffic forecasts and distribution;

E. Primary traffic access routes to and from the study area;

F. Analysis of the proportional responsibility of the proposed development to mitigate forecasted impacts;

G. Recommended mitigation measures, including transportation system management, transportation and parking demand management, and needed transportation improvements; and

H. Evaluation of:

1. Impacts on street function, capacity and level of service;
2. Impacts on on-street parking;
3. Access requirements;
4. Impacts on transit operations and movements;
5. Impacts on pedestrian and bicycle routes and safety; and
6. Impacts on the immediate area and adjacent neighborhoods.

**33.85207.110 Approval Criteria for ~~Cascade Station/Portland International Center~~
 Transportation Impact Analysis Reviews**

The request for development or development capacity will be approved if the review body finds that the applicant has shown that all of the following criteria are met:

- A. The transportation system is capable of supporting the recommended development in addition to the existing uses in the area, as shown by the TIA. Evaluation factors include street capacity, level of service, access to arterials; connectivity; transit availability; availability of pedestrian and bicycle networks; on-street parking impacts; access restrictions; neighborhood impacts; impacts on pedestrian, bicycle, and transit circulation; and safety.
- B. ~~Adequate~~ transportation demand management strategies will be implemented ~~plan is recommended that includes measures to reduce the number of trips made to the site by~~ single-occupant vehicles, especially during peak commuting hours.

Commentary

33.852.115 Duration of a Transportation Impact Review

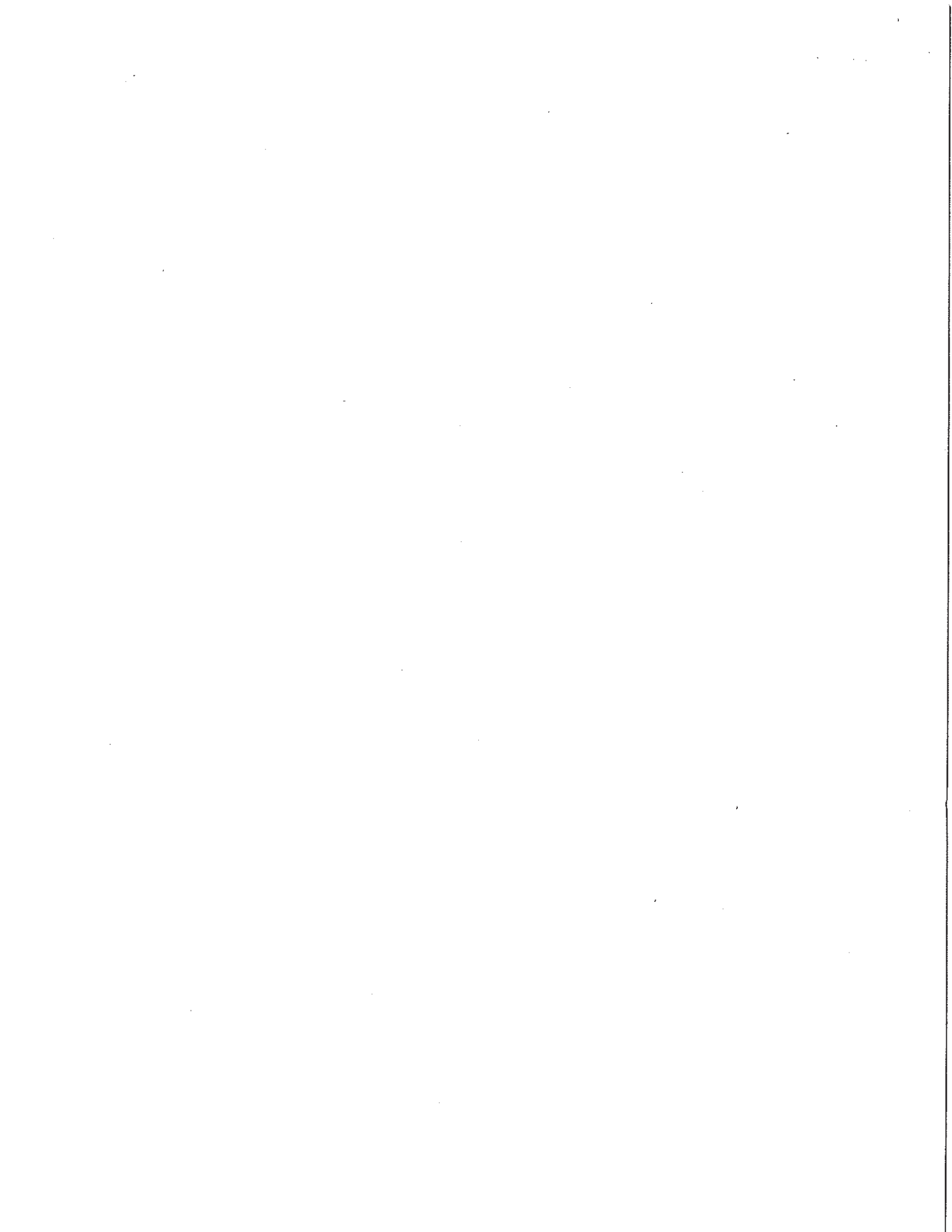
Please note that a ten year expiration date has been added since previous versions to recognize changes to the surrounding transportation network and development that may have an impact on the transportation system.

Language to be added is underlined
Language to be deleted is shown in ~~strikethrough~~

- C. Adequate measures to mitigate on- and off-site transportation impacts are proposed ~~recommended~~. Measures may include, ~~but are not limited to the following:~~ transportation improvements to on-site circulation, public street dedication and improvement or private street improvements, street crossing improvements, improvements to fill in gaps in the local pedestrian and bicycle networks, and transit stop improvements; and
- D. Transportation improvements adjacent to the development and in the vicinity needed to support the development are available or will be made available when the development is complete or, if the development is phased, will be available as each phase of the development is completed.

33.852.115 Duration of a Transportation Impact Review

An approved Transportation Impact review remains in effect for ten years or until development allowed by the review has been completed whichever occurs first.



WHAT WE ARE DOING NOW

We have a number of current strategies in place on our campuses that we plan to continue.

4. PREFERENTIAL CARPOOL PARKING



WHAT IT IS:

Providence provides close-in parking spaces reserved for designated carpools and vanpools.

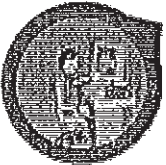
WHAT IT DOES:

Encourages carpooling by providing convenient, consistently located parking spaces for those who participate. Employees benefit from reduced commuting expenses.

FUTURE PLANS:

Providence will continue to provide reserved carpool spaces.

5. TELECOMMUTING OPTIONS FOR SELECT STAFF



WHAT IT IS:

Employees who can perform their job from home do so on selected days.

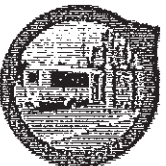
WHAT IT DOES:

Reduces car travel to Providence facilities by allowing employees to perform their functions from home. Employees benefit from reduced commuting time and expense.

FUTURE PLANS:

Providence will continue to provide this option to those employees who are capable of performing their function from home.

6. HOLLYWOOD TRANSIT CENTER SHUTTLE



WHAT IT IS:

Providence provides shuttle service between PPMC and Hollywood Transit Center for use by employees, patients, and visitors.

WHAT IT DOES:

Removes a barrier to using transit, by eliminating the need to walk up to a half-mile from the transit center to the campus.

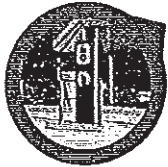
FUTURE PLANS:

Providence will periodically evaluate the schedule for route adjustments.

WHAT WE ARE DOING NOW

We have a number of current strategies in place and future projects that we plan to continue.

7. ELECTRIC VEHICLE CHARGING STATIONS



WHAT IT IS:

Providence provides 10 charging stations at PPMC, two at POP, and two at the NE 53rd and Glisan parking lot.

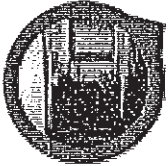
WHAT IT DOES:

Promotes a more environmentally friendly commuting option by allowing vehicle owners to charge their electric car for their return trip from a Providence facility. This measure does not reduce vehicle travel to Providence facilities or the need for on-site parking, but it does help Providence and the region achieve sustainability objectives.

FUTURE PLANS:

Providence will periodically assess the usage of these stations and the need to expand the number of stations.

8. CYCLING FACILITIES



WHAT IT IS:

Providence provides secure bicycle parking, bike racks, and changing and showering facilities for those that commute via walking, running, and cycling, as well as employees who may exercise at lunch.

WHAT IT DOES:

Supports walking and bicycle commuting by providing on-site bike parking and facilities to shower and change into work clothes.

FUTURE PLANS:

Providence will continue to provide these facilities and monitor the need to expand them as demand grows.

9. REDUCE ON-STREET EMPLOYEE PARKING AT NE 53RD AND GLISAN



WHAT IT IS:

Providence is committed to proactively monitoring and addressing employee parking at the 53rd and Glisan medical office building.

WHAT IT DOES:

Focuses employee parking demand on-campus, not in the adjacent neighborhoods.

FUTURE PLANS:

Providence will continue to provide this service to the neighborhood.

WHAT WE ARE PLANNING FOR CONSIDERATION IN THE NEXT TWO YEARS

We have a number of strategies we plan to implement between 2015 and 2017.

15. TRANSIT TRACKER DISPLAYS



WHAT IT IS:

Video monitors (connected to a computer with Internet access) are placed in high-visibility locations and display the next departure times for nearby TriMet lines.

WHAT IT DOES:

Helps employees, patients and visitors plan their departure from the campuses, particularly during inclement weather or at night.

16. BICYCLE TUNE-UP PROGRAM



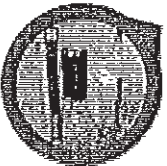
WHAT IT IS:

Providence sponsors a bike mechanic to visit periodically (e.g., twice annually, spring and fall) to provide free bicycle tune-ups for employees.

WHAT IT DOES:

Removes a barrier to bicycle commuting by keeping employee bicycles in good working order, and by providing the service at a time that is convenient for employees. Employees save some money and avoid the need for special trips to a bike shop to drop off and pick up their bicycle.

17. SELF-SERVICE BICYCLE REPAIR AREAS



WHAT IT IS:

A stand for holding a bicycle, with tools for performing minor adjustments and repairs and for inflating tires. Stands would be located at the primary bicycle parking areas at PPMC and POP in areas with video monitoring. In addition to repair equipment, Providence could provide charging stations for electric bicycles.

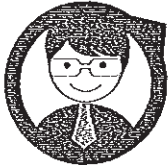
WHAT IT DOES:

Supports bicycle commuting by providing tools for bicycle commuters to make simple repairs to their bicycles on-site, prior to their trip home, rather than having to leave their bike on-site and find an alternative way to get home. Eliminates the need for employees to charge their electric bicycles in their offices or other locations within the PPMC and POP buildings.

WHAT WE ARE PLANNING FOR CONSIDERATION IN THE NEXT TWO YEARS

We have a number of strategies we plan to implement between 2015 and 2017.

18. PROVIDENCE OREGON TDM MANAGER



WHO HE/SHE IS:

A full-time employee responsible for managing, monitoring, and promoting Providence's TDM initiatives. The person should be an active user of non-auto travel modes in order to establish credibility and incent others.

WHAT HE/SHE DOES:

This person could lead employee orientation and training sessions; develop and promote TDM information; work with the neighborhoods, the City and TriMet; monitor existing TDM programs; and identify changes/refinements to the TDM program to ensure its long-term success for all.

19. DEDICATED CARSHARING PARKING SPACES



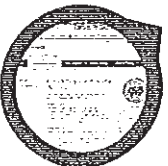
WHAT IT IS:

Providence dedicates a set number (e.g., 2) of on-site parking spaces to carsharing companies, such as Zipcar, whose model involves returning the car to a designated parking space.

WHAT IT DOES:

Provides staff with an additional on-site mobility option for business travel during the day, reducing the need to drive to work because of an off-site meeting during the day. The cars would also be available for non-Providence carsharing members to reserve.

20. TRANSPORTATION OPTIONS INFORMATION ON PROVIDENCE WEBSITE



WHAT IT IS:

Easy-to-find information for staff and visitors on the available options for traveling to Providence facilities.

WHAT IT DOES:

Particularly for visitors, raises awareness of the various non-auto options available for getting to Providence facilities.

WHAT WE ARE DOING NOW

We have a number of different strategies in place on our campuses that we plan to continue.

10. PROVIDE 24-HOUR HOTLINE FOR NEIGHBORS TO REPORT PARKING CONCERNS



WHAT IT IS:

Providence provides a 24-hour telephone hotline that neighbors can call to report parking problems. Reinforces to Providence employees the need to park on-campus.

WHAT IT DOES:

Provides a process for neighbors to report concerns about employee parking directly to PPMC.

FUTURE PLANS:

Providence will continue to provide this service to the neighborhood.

11. GOOD NEIGHBOR AGREEMENT



WHAT IT IS:

As part of the Conditional Use Master Plan, PPMC entered into a Good Neighbor Agreement with the Laurelhurst and Mount Tabor Neighborhoods to establish a process of collaboration on land use and transportation issues.

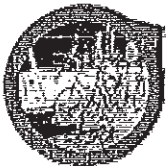
WHAT IT DOES:

Provides a "foundation for on-going communication and collaboration among the parties and the community at large."

FUTURE PLANS:

Providence has a long-term commitment to the GNA.

12. PARTNER WITH NEIGHBORHOODS ON REQUESTS FOR TRANSPORTATION IMPROVEMENTS



WHAT IT IS:

PPMC has committed to working with the Transportation Working Group (TWG) to identify possible transportation improvements that have mutual benefit to residents, PPMC, and other area visitors and employees.

WHAT IT DOES:

Provides a forum for TWG and PPMC to collaborate on ideas and provide a "mutual ask" to the City of Portland, TriMet, and/or other public agencies.

FUTURE PLANS:

Providence will continue to participate in these activities with the TWG.

WHAT WE ARE DOING NOW

We have a number of current strategies in place on all campuses that we plan to continue.

13. PROVIDE VALET PARKING FOR PATIENTS AND VISITORS ON THE PPMC CAMPUS



WHAT IT IS:

PPMC operates valet service at the parking garages for patients and visitors.

WHAT IT DOES:

Enhances the patient experience by minimizing the frustration of trying to find available parking on-campus. Helps PPMC to make more efficient use of existing parking supply.

FUTURE PLANS:

Providence will continue to provide this service, and possibly expand over time.

14. REQUIRE ANNUAL PARKING PERMITS FOR CAREGIVERS ON PPMC CAMPUS



WHAT IT IS:

PPMC Caregivers are required to register their vehicles and receive an annual parking permit during the annual TriMet pass distribution.

WHAT IT DOES:

Ensures registered caregiver cars are parked in employee parking.

FUTURE PLANS:

Continue education and enforcement of parking regulations.

OTHER MEASURES WE MAY CONSIDER IN THE LONGER TERM

21. BIKE SHARING STATIONS



WHAT IT IS:

The City of Portland plans to start a bike sharing program in 2016. The program would likely start in the central city and expand over time. Providence could offer a location at PPMC for a public bike sharing station at the time the program expands eastward.

WHAT IT DOES:

For Providence staff living within the bike sharing program area, a bike sharing station could provide a new commuting option. For all PPMC and POP staff, the station would provide an opportunity to run short errands at lunchtime without using a car. The station would also serve residents of the adjacent neighborhood.

22. BIKE SHARING MEMBERSHIP SUBSIDY



WHAT IT IS:

Providence could sponsor a portion of the cost of an employee's annual membership in Portland's future bike sharing program.

WHAT IT DOES:

Provides unlimited bike rentals for one year (usage beyond a set time, such as 30 minutes per rental, costs extra).

23. CARSHARING MEMBERSHIP SUBSIDY



WHAT IT IS:

Providence could subsidize a portion of the cost of an employee's membership in a carsharing program.

WHAT IT DOES:

Provides an option for having access to a car when needed makes it easier for employees to own fewer (or no) cars and to use alternative modes for the majority of their commuting.

OTHER MEASURES WE MAY CONSIDER IN THE LONGER TERM

24. BICYCLE HUB



WHAT IT IS:

A staffed facility at PPMC that could offer secure bicycle parking, bicycle repair services, bicycle accessory sales, and bicycle-related training (e.g., flat repair, brake and gear adjustments).

WHAT IT DOES:

Makes it easier for employees to commute by bicycle, by offering a variety of bicycle-related services on-site.

25. FILL INFRASTRUCTURE GAPS ON ACTIVE TRANSPORTATION ROUTES



WHAT IT IS:

Providence would provide financial support for completing missing links (e.g., missing bicycle lanes on NE Glisan Street, signaling difficult street crossings) on active transportation routes to Providence facilities.

WHAT IT DOES:

Removes barriers to active commuting to Providence facilities. Benefits the broader community.

OTHER STRATEGIES WE ARE NOT CONSIDERING AT THIS TIME

As we developed our plan, we also identified a number of strategies that are not under consideration in the near-term but we may re-evaluate in the future. Some examples of these include:

- Vanpool for Providence staff;
- Mode choice incentives for non-auto use;
- Paid parking for employees; and
- Adjusting employee schedules.