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March 17, 2016

Portland Planning and Sustainability Commission  
TSP Testimony  
1900 SW 4th Avenue, Suite 7100  
Portland, Oregon 97201

Re: Transportation System Plan/Transportation Demand Management

Legacy Health has participated since January 2016 in a series of discussions concerning the City's proposed Transportation Demand Management (TDM) policies and regulations applicable to proposed Campus Institutional (CI) zoned properties. This discussion has apparently now merged the TDM proposals with the CI zone process, in which Legacy has participated for two-plus years.

Consideration of TDM regulations for Legacy's two urban medical care centers (Good Samaritan and Emanuel) should first involve site-specific analyses of how those centers function. Such functions include a full range of services at both Good Samaritan and Emanuel, from emergency care to highly specialized regional and state-wide programs like organ transplantation, pediatric surgeries, trauma care and burn treatment.

Facilities like Good Sam and Emanuel regularly deal with the most acute or most complicated medical and surgical cases. This dictates when, and under what circumstances, we care for patients and assist and accommodate their families. This makes many of our daily responsibilities unpredictable or requires immediate care decisions to aid patients. We are subject to licensing, regulatory and accreditation standards requiring certain staffing levels and having skilled professional services continually available.

This means managing vehicle usage at our facilities is much more problematic than for virtually any other Metro Portland organization or business. While we are a major employer in Portland, our primary function remains service to the public through delivery of highly essential health care.

Legacy supports as a health-related matter, reductions in air pollutants and emissions resulting from vehicle usage, along with our general support for other environmentally sustainable practices. We continue to cooperate and collaborate with the City and the community in working toward such reductions, especially as the City grows. But growth will carry with it a larger calling for the services Legacy provides, making practical and important limits on how TDM can be best utilized at Good Samaritan and Emanuel vital.

Legacy was an early and committed supporter of the Portland Streetcar, which serves the Good Samaritan area. We encourage at both centers, when feasible, mass transit, carpooling, bicycle and pedestrian trips. However, there are practical, care-related constraints on Legacy's ability to control

vehicle trips to our facilities. Patients and family rarely use mass transit, bicycle or pedestrian means to travel to or from health care visits and stays. An overwhelming number of professional staff provide service on carefully designed schedules or on-call based on patient needs. Physicians frequently perform procedures or visit patients at multiple facilities at times dictated by their availability and patient requirements. (To minimize physician travel, Legacy encourages physicians to locate their offices close to our facilities.) Because of the services we provide at our facilities external factors often determine by whom, and when, our facilities are accessed.

Legacy welcomes the opportunity to inform City staff about how our facilities function and how a workable set of TDM policies, regulations and plans can be separately developed for Good Samaritan and Emanuel Medical Centers. We need to take into account Legacy's over-riding mission of providing care to our community in a skilled, timely and human-focused manner.

Because we have not seen any proposed TDM regulations nor have the opportunity to understand how proposed TDM code sections would specifically impact Good Samaritan and Emanuel, we are presently unable to offer responses to such proposals or to currently develop site-specific TDM plans.

We would like to discuss with staff such proposals so that we can offer comments from the perspective of each of our medical centers. We hope City staff can visit both Good Samaritan and Emanuel to see first-hand how these centers function, so we can engage in informative conversation.

Sincerely,

A handwritten signature in black ink, appearing to read 'Everett W. Newcomb III', written over a horizontal line.

Everett W. Newcomb III, D.O.  
Chief Operating Officer  
Legacy Health