

March 22, 2016

Ms. Katherine Schultz, Chair
City of Portland Planning and Sustainability Commission
1900 SW Fourth, Suite 7100
Portland, OR 972101

Re: Proposed Transportation System Plan

Dear Ms. Shultz and members of the Planning and Sustainability Commission:

Like many Portlanders, we are astonished to realize one of the consequences of adding 120,000 jobs and welcoming 260,000 new neighbors to our city during the next twenty years: an increase of some 538,000 daily commutes in our city. Anecdotal evidence tells us that we have already reached a tipping point in traffic congestion; it is hard to imagine half-a-million more vehicle commutes. Those commutes could create gridlock and increase health risks, especially for children. By adding to the momentum of climate change, they would jeopardize objectives and action items of the Commission's Climate Action Plan.

We wish to congratulate and thank the staff of the Portland Bureaus of Transportation and Sustainable Development for drafting realistic and equitable proposals for dealing with this problem through City Code changes implementing the Campus Institutional Zone TDM plans. In addition to that, we would like to make these points:

First, we support the proposals' goal of facilitating the growth of medical institutions on which we're dependent and of which we are proud.

Second, we agree that the extra load on our streets cannot be handled by infrastructure improvements alone. Like several other neighborhoods, Laurelhurst and North Tabor have problematic intersections and signals that still, to our knowledge, aren't on the TSP project list for funding. We simply can't build our way out of traffic gridlock.

Third, it is only common sense to attempt to keep the traffic load as close as possible to its present level by setting performance targets. Contrary to the claims of some, SOV performance targets don't conflict with the over-all goal of facilitating the growth of institutions; in fact, they make that goal attainable. If the citywide non-SOV target of 70 percent is not reached, all of us will be affected adversely. Medical institutions, in particular, will find their operations compromised.

At times we hear the argument that medical personnel can't be expected to shift a significant number of their commutes to public transit and other non-SOV modes. By not encouraging such a shift, however, medical institutions put their own personnel at the disadvantage of being stuck

in the very traffic they are partially responsible for generating. Even though many medical personnel commute trips are taken in off-hours that do not count in the SOV tally, congestion in peak hours caused by high SOV rates is pushing vehicular commute times toward those of buses.

Fourth, it has been demonstrated that setting performance targets is among the most cost-effective methods for dealing with increases in daily commutes.

Fifth, the city-wide performance target proposed by PBOT—a 70 percent non-SOV rate—is reasonable and achievable, given all the strategies available in aggressive TDM plans. Similar performance targets and aggressive TDM plans that have been set in place at medical institutions in other U.S. cities as well as here in Portland have been effective in reducing SOV rates without, at the same time, compromising in any way hospital missions or operations.

Not only that, but the target has been adjusted to different transportation infrastructure and commuting options currently existent in different regions of the city and for different types of workforces.

Sixth, setting performance targets is a detailed and data-driven process that is well-suited to PBOT's administrative rule-making. It wouldn't be appropriate to attempt establishing such a process, with all of its technical data and criteria, through legislative deliberations.

Seventh, the PBOT plan provides for a clearly defined and consistent process for modifying institutional performance targets. The proposed path for approving a TDM plan is a Type II hearings process. The same path is available to institutions for modifying their TDM performance targets. After the prescribed comment period, PBOT staff will review plans as well as proposals for modification of performance targets. Appeals to staff decisions will be allowed during a fourteen-day period.


This recourse, which assists institutions and PBOT in the on-going work of matching new and emerging TDM strategies to special and changing requirements of various institutions, allows for the critical input of neighbors. Neighbors can help assess the success of a TDM plan in meeting its performance target. They are in position to alert institutions and PBOT to such undesirable consequences, for example, as spillovers onto neighborhood streets in response to traffic slowdowns on main thoroughfares.

Conclusion

PBOT's proposals for TDM plans are equitable inasmuch as they are based on the idea of making all modes true options for commuters. They are equitable because they can be applied citywide—from institutional zones to mixed-use zones and beyond. They are equitable inasmuch as they don't venture the impossible task of accommodating one group of commuters over another. They are equitable, finally, because they incorporate the awareness that we are all in this

together—all of us potentially hurt by unhealthy growth patterns and all of us partners in finding solutions that make growth truly healthy.

Duly representing the Laurelhurst Board of Directors


James Parker

Jim Edelson

Tony Nickles