

August 9, 2016

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

Dear Chair Schultz and Commission Members:

The Portland Business Alliance appreciates the opportunity to comment on the proposed Central City 2035 Plan. With more than 1,850 member companies, the Alliance's mission is to promote and foster an environment in the Portland region that attracts, supports and retains private-sector jobs and spurs economic vitality. The health of Portland's central city is critical to achieving our mission and as a result, over the last several years we have participated in the quadrant planning process that has culminated into the proposed Central City 2035 Plan.

We recently provided feedback on the proposed Central City 2035 Plan in a letter dated July 12, 2016 that focused on a broad range of issues, including but not limited to, low-carbon buildings, river overlays and transportation demand management (TDM). While the issues outlined in that letter are equally important, the purpose of this letter is to focus solely on transportation elements of the proposed plan. Since the central city serves as our region's economic engine with a dense concentration of jobs and housing, and is a gateway to other parts of the Portland-metro region and state, it is critical that it have a strong multi-modal transportation system that moves people and goods efficiently. With that in mind, we offer the following comments:

Mode Split Targets:

We understand that we face significant population growth over the next 20 years and that increased pressures on our transportation system will result in significant gridlock if we do not seek ways to address congestion. There will be more people and increased demand on all modes. That said, we are concerned that the aspirational mode split goals were not developed based on analysis of what is possible. While these may be aspirational goals, we are concerned that such performance targets are driving decisions about transportation investments and policies. Instead, we need to be extremely thoughtful about the prioritization of modes and use of streets, and evaluate transportation policies and projects as part of the larger network and capacity needs for a variety of modes.

Transportation Demand Management (TDM):

We understand that TDM is being considered as a way to help alleviate future demands on our city's transportation network by encouraging alternative modes of transportation through education and or subsidies to tenants. The TDM proposal, however, is too conceptual at this point. The details need to be fine-tuned so that the program does not hinder development, unfairly burden the development community, and further hamper the city's ability to accommodate housing and job growth in the central city.

We are, therefore, pleased that PBOT has agreed to spend additional time working with property owners and developers on a TDM proposal for the central city. As such, Policy 9.51 on TDM should be eliminated or amended until the city has spent additional time working on a proposal with property owners and developers as agreed to. The central city is unique because it has higher land values, density, maximum parking ratios, paid on-street parking and a strong multi-modal network in comparison to outer parts of the city. If a TDM proposal is developed, it should take into account these unique characteristics.

Portal Capacity:

The Alliance has long advocated for maintaining and enhancing portal capacity at bridgeheads and freeway on- and off-ramps. We appreciate Policy 9.41 on portals but ask that the language be strengthened. The policy currently reads, "Manage entry points into the central city to provide balanced multimodal access to efficiently accommodate the increase in person trips and goods delivery as a result of growth and development." Instead, the policy should read as, "Protect and enhance portal capacity at bridgeheads and freeway off-ramps and on-ramps into the central city to efficiently accommodate the increase in person trips and goods delivery as a result of growth and development."

Public Right-of-Way (ROW):

Policy 9.46 states, in part, "expand open space and recreation functions in the right-of-way where possible." With increasing housing and employment forecast in the central city, and the increased demand that it will put on the transportation system regardless of mode, encouraging use of the right-of-way for non-transportation related functions makes little sense. Elsewhere, the Transportation System Plan (TSP) acknowledges that managing growing congestion will be a challenge, and offers mitigating strategies to ensure people and goods can continue to move throughout the central city. All existing capacity should be reserved to support transportation related purposes.

Similarly, commercial arterials and freight corridors should not be considered for other community uses and on-street parking should not be comprised under Policy 9.47, which encourages "community uses of the right-of-way." PBOT should not further limit already limited road capacity including the public right-of-way.

Parking:

Parking is and will remain an important part of maintaining a vital central city, serving businesses, shoppers, visitors, employees and residents. Both on-street and garage parking is needed to serve the needs of the central city and should not be compromised. We want to actively participate in PBOT's discussions about

managing parking in a more efficient and dynamic manner including with performance-based parking and the joint use of existing stalls.

Naito Parkway:

We are concerned with the TSP's direction for Naito Parkway. First, the TSP includes a study intended to assess "ways to lessen the impact of freight and general traffic on Naito Parkway." Naito is a primary north/south street for both freight and general traffic, allowing an alternative to traveling on streets through the heart of downtown. In addition, Naito is mapped as a major city bikeway and civic corridor, but has no freight classification despite the fact that it is one of the most significant roadways for freight traveling from the Central Eastside industrial district to I-5 South. In fact, the Morrison Bridge, the ramp onto Naito and the access to I-5 are labeled as major truck streets, but there is a gap in the classification along Naito, the very route that would connect two major truck streets. The current classification of Naito would then undermine its significance to the Central Eastside and hinder freight mobility from the district. Naito's role in moving goods and people should be acknowledged, both in its street classification and in the studies, which should be revised to ensure that freight and general traffic are not limited. Specifically, we have the following recommendations about the below proposed studies:

Morrison Bridge Westside Ramps Reconfiguration Study – This study must be coordinated with ODOT and must include traffic analysis to ensure modifications do not negatively impact the safety and operations of I-5, and do not negatively impact freight access from the Central Eastside to I-5 southbound. Change the sentence "Consider the impacts to providing southbound freeway access from the Central Eastside" to "Maintain southbound freeway access from the Morrison Bridge for freight trips originating from the Central Eastside," consistent with the Staff Proposed Amendments to the Recommended Draft Southeast Quadrant Plan, dated July 6, 2015.

Morrison Bridge Eastside Ramps Reconfiguration Study – This study must be coordinated with ODOT and must include traffic analysis to ensure the reconfiguration does not negatively impact the safety and operations of I-5.

Naito Parkway Traffic Study – This study must be coordinated with ODOT and address impacts to safety and operations of other freeway ramps in the vicinity.

Additionally, we are concerned that the proposed street classifications inadequately take into account freight and auto access, and circulation patterns. Freight and auto access will continue to be important to the well-being of businesses located in the central city. Particular attention must be paid to the ability to access parking garages and businesses by auto and loading zones for freight deliveries.

New Projects:

There are multiple new projects in the proposed TSP that have not been adequately vetted with stakeholders. PBOT will shortly undertake the *Central City Multimodal Study* using grant funds to analyze opportunities and locations for multi-modal improvements in the central city, particularly in the downtown core. We understand PBOT intends to initiate a stakeholder process for this significant undertaking. Despite

the fact that work and outreach has not yet begun, TSP ID 20126, 20127, 20128, 20130, 20131, 20132, 20133, among many, many others, state that the project will “design and implement” or “construct” significant new facilities. It is inappropriate to include these projects at this time given that the study to seek public input, and analyze alternatives and impacts has yet to be undertaken.

Central Eastside Industrial District (CEID):

The CEID is a significant employment district and has an important function in serving businesses in the central city. As a major employment center in the central city and as an industrial sanctuary, it has specialized needs for freight mobility, and loading and unloading capabilities, as well as efficient parking and access to businesses.

We, therefore, urge that the language be added to TSP projects 20063, 20151, 20173, 20174, 20175, 20176, 20181, 20182, 20194 and 20195 that states, “review the impact to freight, loading, unloading and the ability of the CEID to continue to be a vibrant employment district prior to implementation of this project.” These plans should be reviewed in a broader context that would take into account the unique environment of a district still focused on industrial and employment growth. Further, we urge that the *Central Eastside Truck Access Study* be added back to the proposed list of studies in order to evaluate circulation to improve connections in the Central Eastside and reduce conflicts with non-industrial land uses before specific projects are implemented.

We look forward to working together to address the above referenced concerns for a healthy, prosperous and vibrant central city over the next 20 years. 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: Portland City Council
Susan Anderson, Bureau of Planning and Sustainability
Leah Treat, Portland Bureau of Transportation
Art Pearce, Portland Bureau of Transportation