



August 9, 2016

Portland Planning and Sustainability Commission
1900 SW 4th Ave, Suite 7100
Portland, OR 97201

RE: Central City 2035 Plan Testimony

The Portland Freight Committee (PFC) appreciates the opportunity to provide our comments on the Proposed Draft of the Portland Central City 2035 Plan. We provided comments on the Discussion Draft by letter dated April 9, 2016, and are pleased to see that the current draft responds to many of our earlier comments.

In particular, we are pleased to see the removal of NE/SE 9th Ave as a City Bikeway and the addition of SW Harbor Drive from I-5 to Naito Parkway and the westerly (north) ramp connecting the Morrison Bridge to Naito Parkway added as Major Truck Streets to the Freight Classification Map. We are also pleased to see the SE Quadrant Plan actions being proposed as TSP projects such as new signals on MLK/Grand and Stark and Washington (TSP ID 20073), improving traffic flow on MLK/Grand by adding protected left turns (TSP ID 20182), and improving access by installing a traffic signal at NE Irving and 16th (TSP ID 20178) which is currently being submitted as a 2018-21 Regional Flexible Funding freight project application.

The comments below pertain to elements of the CC 2035 Plan where the Proposed Draft does not address our earlier comments or where new proposals have been added.

Central Eastside Access to southbound I-5

While certain segments of the Central Eastside access route to southbound I-5 have been added to the Freight Classification Map as Major Truck Streets as noted above, there is still a significant classification gap along Naito Parkway from the Morrison Bridge ramp to SW Harbor Drive. The Central Eastside Industrial District (CEID) is dependent on access to I-5 southbound by crossing the Morrison Bridge to Naito Parkway and then to Harbor Drive. Leaving a gap in this route compromises the ability of Naito Parkway to serve freight access needs to southbound I-5. We strongly recommend that language be added to TSP ID 20127 that states "Design and implement a separated two-way walkway and bikeway on the east side of Naito Parkway" while ensuring freight movement from the Morrison Bridge to Harbor Drive.

Proposed changes to the Public Review Draft

The following comments are specific to the bulleted TSP projects and the underlined recent changes from the previous Discussion Draft:

- TSP ID 20176: Enhance pedestrian and bicycle safety and access by installing improved crossings at Ankeny, Salmon, Madison, Clay, and Harrison. Design and implement bicycle facilities on 11th and 12th by removing on-street parking or travel lanes as needed.
- TSP ID 20194: Design and implement a bikeway from I-84 to Division, with separated bikeway segments, neighborhood greenway segments, and crossing improvements as needed. Includes enhancement of existing bicycle facilities on 7th Ave from Sandy to Division by removing parking and/or center turn lane as needed.

The segment of NE/SE 12th Ave from Lloyd Blvd to SE Powell and the segment of SE 11th Ave from Sandy to SE 12th Ave are classified as Major Truck Streets in the TSP and Freight Master Plan. This classification is designed to serve as principal routes for trucks and provide truck mobility and access to commercial and employment uses along the 11th/12th Ave corridor. The segment of SE 7th Ave from Sandy to Division is classified as a Freight District Street which is intended to provide safe and convenient truck mobility and access in industrial and employment areas serving high levels of truck traffic. The adopted *Designing for Truck Movements in Portland* guidelines call for 12-foot travel lanes as preferred with 11-foot travel lanes being acceptable if approved by the city traffic engineer for both of these street classifications. While the PFC is not opposed to the benefit these bike/pedestrian projects may yield, we are concerned the proposed language for the removal of on-street parking and/or travel lanes is both premature and inconsistent with adopted city policy and that a more thorough traffic impact analysis is needed to evaluate the potential negative impacts from a further reduction in roadway capacity.

We recommend that the City adopt the following hierarchy in facilitating bicycle movement on Major Truck Streets located within the CEID:

- a) Restripe to accommodate bike lanes without removing travel lanes or reducing existing lanes to a width of less than 12 feet.
- b) Remove on-street parking to accommodate a bicycle lane only if additional on or off-street parking is added within the district to offset the loss.
- c) As a last resort, remove travel lanes if it can be demonstrated that freight travel time in the corridor will not be degraded rather than reducing travel lane width below 12 feet. Narrower lanes provide the illusion of capacity on the route but are not safe for freight vehicles and create conflicts between freight and other users when the freight vehicles can't effectively fit in the lanes.

When travel lanes are to be removed from streets that have lanes less than 12 feet wide, expand the remaining travel lanes up to 12 feet as well as expand the bicycle lanes. A more comfortable lane width eases tension and creates a safer corridor. This is true for both bicycle lanes and motor vehicle lanes.

- TSP ID 20195: Design and implement multimodal transportation improvements to enhance safety and accessibility along 3rd Ave through the Central Eastside, including truck access improvements, pedestrian crossings, and shared roadway bicycle facilities.

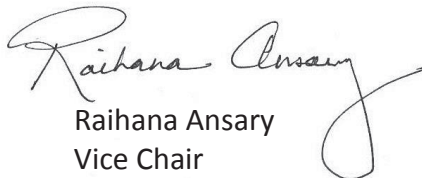
In 2010, City Council adopted the *Central Eastside Street Plan* which identified specific street function and design for streets within the Employment Opportunity Subarea (EOS) zoning district. This process was guided by a Technical Advisory Committee (TAC) and a Community Working Group (CWG) which involved various local businesses and stakeholders from the bicycle, pedestrian and freight advisory committees. Through this process, SE 2nd and 3rd Avenues were identified as a Truck Loading Streets due to the high concentration of loading activities that occur within the public right-of-way. Many members of the TAC and CWG have expressed their concern about mixing bicycle traffic with active loading activities in respect to both safety and the potential to hinder the loading functions of existing businesses. The PFC is concerned that purposely routing bicycles on SE 3rd Avenue will create potential conflicts with the existing loading activities that take place along this street and recommend that alternative routes be evaluated more thoroughly for accommodating bicycle traffic through this area. We also suggest that specific plans, such as the adopted *Central Eastside Street Plan*, that have had broad-based community input and support be given preference to more general city-wide plans.

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,



Pia Welch
Chair



Raihana Ansary
Vice Chair

Cc: Mauricio Leclerc
Grant Morehead
Troy Doss