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To: Planning and Sustainability Commission <psc@portlandoregon.gov>
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Subject: TSP3

I am submitting additional testimony to OPPOSE the reclassification of SE 21st AVE (between SE Division and SE Powell) as a Secondary Emergency Response Route. The response to my previous comments was insufficient and lacking in detail. Consideration of SE 21st Ave between Powell and Division in the same light at SE 20th between Division and Hawthorne is inconsistent with the differing classification of the two streets (local service vs. neighborhood collector)

The PBOT "Staff Response to Public Comments on TSP Stage 3 Discussion Draft" dated September 21, 2017 to my request regarding reclassification of SE 21st was an add on to the discussion of SE 20th as follows:

*The upgrade of SE 20th Ave from Hawthorne to Division from Minor Emergency Response to Major Emergency Response was based on a Portland Fire & Rescue request, but they have agreed in response to Discussion Draft testimony to support it being a Secondary Emergency Response street instead. This means that speed bumps will be replaced with speed cushions of a similar effectiveness in conjunction with any future paving or upgrade project, without needing to seek permission from Portland Fire & Rescue. **The same applies to SE 21st Ave from Division to Powell.***

Negative Impacts to Existing Traffic Calming without Significant Advance in Emergency Response Time

In 2000, the concerned residents of SE 21st Ave began working with the City of Portland to install meaningful traffic calming elements on SE 21st Ave between Division and Powell. After nearly 3 years, working very closely with City staff and our neighbors we were allowed to move forward with the project, purchase (we raised over \$10,000) and install the traffic calming elements that I know have significantly increased the safety of our Local Service Street. The designation of SE 21st between Division and Powell as a Secondary Emergency Response Route will replace this traffic calming feature (that we - the neighbors paid for) with a significantly less effective traffic calming element that will not increase response time but adversely affect the safety of our Local Service Street. Installation of these speed bumps on SE 21st was a hard-won victory, and was paid for by residents and local businesses, and they transformed the neighborhood for the better. Removing them, or replacing them with less effective devices, would deal a serious blow to both residents and the many visitors who bike and walk along and across the street daily.

Adverse Impacts to Other Planned Multi-modal Functionality

Over the years, we have seen a significant increase in bicycle commuting in Portland - especially in the inner locations - close to downtown. I myself am a bicycle commuter and strongly support traffic planning and project implementation to encourage further bicycle commuting in Portland - I feel it is essential to making our city a livable community. The Financially

Constrained TSP includes the SE 21st Ave Bikeway, a funded project scheduled for the next 10 years (TSP 70081). The exact nature of the project has not yet been defined, however, we have STRONG neighborhood support for a solution consisting of some sort of shared auto/bike space. While the nature of this project is not a subject of the TSP, a Secondary Emergency Response designation on SE 21st would add unnecessary constraints and complications to the project, and could preempt designs or solutions that might otherwise be considered.

Contradicts Comprehensive Plan

The Portland Comprehensive Plan, Policy 9.40, states that an Emergency Response Route should not “negatively impact traffic calming and other measures intended to reduce crashes and improve safety.” TSP Policy 9.4.d says "When the existing use of a street does not comply with its classification, no additional investments should be made that encourage that inappropriate use." Replacing more effective speed bumps with less effective speed cushions is a negative impact, and would encourage higher volumes and speed, which is an inappropriate use for a Local Service Street.

Request for PBOT Consideration:

1. Remove the Secondary Emergency Route designation from SE 21st.
2. Propose the following language change to Policy 6.10 (B).

B. Secondary Emergency Response Streets

Secondary Emergency Response Streets are intended to provide alternatives to Major Emergency Response Streets in cases when traffic congestion, construction, or other events occur that may cause undue delays in response times.

- Improvements. Design treatments on Secondary Emergency Response Streets should enhance mobility for emergency response vehicles by employing preferential or priority treatments, while also allowing for limited traffic slowing treatments to enhance safety and livability.
- Traffic Slowing. Secondary Emergency Response Streets that also have a Local Service or Neighborhood Collector traffic classification are eligible for speed cushions. Secondary Emergency Response Streets that also have a District Collector or higher traffic classification are not eligible for traffic slowing devices in the future. Existing speed bumps on Secondary Emergency Response Streets may remain temporarily, and shall be replaced with speed cushions when streets are repaved or undergo other major modifications. Speed cushions ~~should~~ shall be designed to achieve a similar level of traffic speed reduction as speed bumps.

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