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Sent: Tuesday, September 26, 2017 11:45 AM
To: Planning and Sustainability Commission <psc@portlandoregon.gov>
Cc: Bike Loud PDX <bikeloudpdx@gmail.com>
Subject: TSP3

To: Planning and Sustainability Commission
From: BikeLoudPDX
RE: TSP3 Testimony

Dear Commissioners,

We at BikeLoudPDX would like to submit the following testimony regarding Stage 3 of the TSP.

We applaud that Vision Zero appears as a top priority throughout the document and that bicycle mode share is again at 25%. We do however, have concerns about policy conflicts contained in the current draft of the TSP3, specifically when Neighborhood Greenways overlap Major and Secondary Emergency Response Routes. There are many examples of such overlap throughout the city. We are also concerned about how the Emergency Route designation on SE 21st might preempt design options for the SE 21st Avenue Bikeway project (TSP 70081), detailed below. We would like to thank the Planning and Sustainability Committee for your work incorporating feedback into the multiple drafts of this document.

Mode Share Goals

We support the 25% bicycle mode share as described in the **Performance Measures** on Page 7-3. BikeLoudPDX is aware that we are not on track to meet this mode share target and need additional support and strategies for making cycling the most attractive transit option for trips less than 3 miles. We thank the commissioners for not reducing our target in spite of the "surprisingly low bike commute mode share" progress we have made so far. We urge the committee to set additional short term goals, such as 5 & 10 years to measure our progress. Additionally there are no additional resources allocated if these goals are not met.

Greenway/Emergency Route Conflicts

The TSP Traffic Calming Objective states that PBOT should "use traffic calming tools, traffic diversion, and other available tools and methods to create and maintain sufficiently low automotive volumes and speeds on neighborhood greenways to ensure a comfortable cycling environment on the street."

PBOT's Neighborhood Greenway Report specifies that this means vehicle speeds should be limited to 20 mph, which is PBOT's target vehicle speed for all Neighborhood Greenways.

TSP Policy 6.10 (Emergency Response Classification Descriptions) states that speed bumps are prohibited on Major Emergency and Secondary Emergency Response Streets, and where they exist, mandates they (eventually) be removed, to be replaced with speed cushions. Speed cushions are essentially speed bumps designed such that trucks can pass over them without slowing.

PBOT engineers have found that speed cushions are unable to slow vehicular traffic sufficiently to achieve the 20 mph limit called for by Neighborhood Greenway policy. Speed bumps,

prohibited on Emergency Routes, are the only traffic calming device PBOT uses that is capable of achieving vehicle speeds of 20 mph.

Therefore, where Major or Secondary Emergency Routes overlap Neighborhood Greenways, PBOT has a conflict: One policy calls for certain performance standards, while another prohibits the only tools available to achieve those standards.

The Portland Comprehensive Plan Policy 9.40 (Emergency Response) states PBOT should “maintain a network of accessible emergency response streets to facilitate safe and expedient emergency response and evacuation. Ensure that police, fire, ambulance, and other emergency providers can reach their destinations in a timely fashion, **without negatively impacting traffic calming** and other measures intended to reduce crashes and improve safety.” (emphasis added)

This suggests that the TSP should discourage the overlap of Neighborhood Greenways and Emergency Routes, and that speed bumps should be permitted on Neighborhood Greenways where overlaps occur.

Examples of Conflict

The segment of SE 21st between Clinton and Division is a Neighborhood Greenway, and despite the presence of speed bumps, underperforms Greenway standards for both speed and volume. The TSP proposes designating this segment a Secondary Emergency Route. If the classification of this segment changes, existing speed bumps will be replaced with less-effective speed cushions. Furthermore, this segment experiences a high volume of heavy truck traffic, and these vehicles, currently slowed by the speed bumps, will be able to pass through speed cushions unimpeded.

Replacing existing speed bumps with less effective speed cushions would clearly violate both the letter and spirit of Comprehensive Plan Policy 9.40's mandate that Emergency Routes not negatively impact traffic calming.

Another illustration of the conflict is SE Harrison, between SE 26th and SE 30th. SE Harrison is a major east-west greenway currently undergoing a major traffic calming project, with speed bumps and diversion planned along the route. Unfortunately, between SE 26th and SE 30th, Harrison is also a Secondary Emergency Route. This will permit only the installation of speed cushions, which will make the overall project less effective by negatively affecting the very traffic calming measures the Comprehensive Plan dictates should not be impacted.

SE 21st Avenue Bikeway Project (TSP 70081)

BikeLoudPDX is also concerned about the effect that declaring SE 21st from Powell to Division a Secondary Emergency Route would have on plans to build the SE 21st Avenue Bikeway project, a funded 10-year TSP project. SE 21st is heavily used by cyclists, and we are concerned that the designation of SE 21st as a Secondary Emergency Route will unnecessarily constrain the design options available to PBOT. We also wish to point out that, from a practical standpoint, such a designation would achieve nothing of value over the next decade.

Aside from the conversion of speed bumps to speed cushions (which would only happen when the street next undergoes major construction, still decades away), the designation of a street as

a Secondary Emergency Route has very little practical impact – it is only a line on a map. We ask that the Emergency Route designation be deferred until after design and construction of the SE 21st Bikeway project. In the meantime, emergency response vehicles would continue to be free to use the street, as they (very rarely) do today.

In Conclusion

We therefore ask that you:

1. Reduce policy conflicts between Neighborhood Greenways and Emergency Routes, by modifying TSP Policy 6.10 as follows:
 - A. Discourage the designation of Emergency Response Routes that overlap Neighborhood Greenways, perhaps by adding a 6.10.A.c and 6.10.B.c stating *“Where possible, Major/Secondary Emergency Routes should not be designated where they overlap Neighborhood Greenways.”*
 - B. Where such overlaps do occur, clarify that speed bumps are permitted where speed cushions cannot assure that the performance standards of Neighborhood Greenways are met. This could be done by adding the following to 6.10.A.b and 6.10.B.b: *“Speed bumps may still be used on streets designated as Neighborhood Greenways where needed to achieve Greenway performance standards.”*
 - C. Change language in 6.10.A.b and 6.10.B.b from *“speed cushions should be designed to achieve a similar level of traffic speed reduction as speed bumps.”* to *“speed cushions shall be designed to achieve a similar level of traffic speed reduction as speed bumps.”*
2. Remove or postpone the designation of SE 21st from Powell to Division as a Secondary Emergency Route until after the SE 21st Bikeway has been designed and built.

Thank you,

Emily Guise and Catie Gould
BikeLoudPDX Co-Chairs