



September 26, 2017

RE: TSP Testimony

Dear PSC Commissioners,

The Hosford Abernethy Neighborhood District submitted three letters of testimony to PBOT regarding their first draft of the 2017 TSP. While the TSP draft has improved since its last iteration, many of our concerns are still relevant.

Our issues are summarized below, and the full letters are attached.

1. We oppose designating SE 20th and SE 21st as Secondary Emergency Response Routes. Both of these streets have speed bumps, and we have been told by PBOT staff that speed cushions are not as effective at controlling speeds. Downgrading existing traffic calming measures would contradict the Portland Comprehensive Plan Policy 9.40, which states that emergency routes should ensure emergency access “without negatively impact traffic calming and other measures intended to reduce crashes and improve safety.”

Additionally, SE 21st is part of the Clinton Neighborhood Greenway, has a high volume of bicycle traffic, and will soon be the subject of the SE 21st Ave. Bikeway Project (TSP 70081). It also has a high volume of heavy trucks, garbage trucks, and tow trucks serving New Seasons, People’s Co-op, and the towing companies south of Powell. Speed cushions are specifically designed to allow trucks to pass over them without slowing. Combining high bicycle volumes with unslowed trucks can literally have fatal results, as recent truck-bicycle crashes have tragically illustrated.

Possible remedies could include:

- a. Strike or soften language from TSP Policy 6.10 (Emergency Response Classification Descriptions) that currently states:

“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.”

This could be updated to mirror policy language from the Comprehensive Plan:

“Existing speed bumps on Secondary Emergency Response Streets can be



replaced with speed cushions when streets are repaved or undergo other major modifications if doing so would not negatively impact traffic calming and other measures intended to reduce crashes and improve safety.”

- b. Remove the Secondary Emergency Response designation from SE 20th and SE 21st. (Emergency vehicles rarely use these streets, and would be free to continue using them with or without an Emergency Response route designation)
 - c. Defer Secondary Emergency Response designation for SE 21st until the next TSP to allow time to develop and implement the SE 21st Ave. Bikeway project without the constraints an Emergency Route designation would have. As there are no major construction projects planned for SE 21st in the coming decades, such a deferral would have no practical impact. The designation could be added in the next TSP with no short or long-term harm to our emergency response network.
2. The designation of SE 20th should not be changed from Local Service Street to Neighborhood Collector. The policy rationale for doing so is weak (regional policy guidance suggests 1/2 to 1 mile spacing of collector-level streets on an idealized grid, but goes no further than that), and, as PBOT noted in their response to our comments on the matter, changing the designation would impact neither existing traffic control devices nor traffic speeds and volumes.

Our concern is twofold: First, we would like to see improvements to the cycling infrastructure on SE 20th that would be more difficult if the street is a Neighborhood Collector; and second, while the upgraded classification might not lead directly to any immediate changes, it would open the door in the future, permitting, for example, diversion of vehicles onto 20th from streets such as SE Division (which violates policy today, but would be allowed with the classification change). Since there is no actual benefit to PBOT or the transportation network for making this change, and some real potential costs, we ask that you reverse it.

3. We believe there is a conflict between Neighborhood Greenway policy, which seeks to achieve vehicle speeds of 20 mph, and Emergency Response Route policy, which prohibits the use of speed bumps (the only devices PBOT currently uses capable of achieving those speeds). When such designations overlap, as they do in HAND on SE 21st and SE Harrison, as well as other locations throughout the city, PBOT’s solution is to apply the Emergency Response rules and prohibit the use of speed bumps. However, as noted before, this violates Comprehensive Plan Policy 9.40’s specification that emergency routes should not impact traffic calming. We feel the policy should be



clarified and be explicit, and should be compatible with language in the Comprehensive Plan by permitting speed bumps on these sections. It is worth noting that the overlaps we are aware of are short, so this request would have a minimal impact on emergency response times while having a significant positive impact on safety on the Greenways.

Please refer to our full letters below, and thank you for considering our concerns.

Yours respectfully,

Christopher Eykamp
Vice-chair of Hosford Abernethy Neighborhood District



July 2, 2017

Comments on the Transportation System Plan (TSP) Update 3:

The Hosford Abernethy Neighborhood District (HAND) Board strongly opposes proposals in the TSP to increase the emergency classification of SE 20th (Division to Hawthorne) and SE 21st (Powell to Division) from Minor Emergency Response Streets to Major Emergency Response Street and Secondary Emergency Response Street respectively.

Both of these streets currently have traffic calming devices that would be prohibited under the new classifications. While the TSP states that the existing traffic calming could remain “temporarily,” they would eventually be removed and replaced with devices that have so far proven ineffective. We have heard clearly from residents that the traffic calming devices have made significant contributions to safety and quality of life in the neighborhood, and in both cases, residents and businesses paid for the current calming devices to be installed.

The Portland Comprehensive Plan Policy 9.40 states that the purpose of Emergency Response is to “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.” Downgrading or removing existing traffic calming measures that have proven effective at addressing an intransigent speeding problem and increasing safety violates this policy.

The HAND Board opposes changing the emergency route designations of SE 20th and SE 21st unless the TSP policies are updated to allow the existing traffic calming devices to remain in place permanently.

Thank you,

Susan E. Pearce
Chair of Hosford Abernethy Neighborhood District



June 29, 2017

Comments on the Transportation System Plan (TSP) Update 3:

The Hosford Abernethy Neighborhood District (HAND) Board wishes to express support for designating SE 26th (north of Division) a Local Service Street. We also oppose changing the designation of SE 20th (Division to Hawthorne) from Local Service Street to Neighborhood Collector.

We want our residential streets to be classified as Local Service Streets because of the policies tied to street classification. For example when future changes are contemplated for 20th or 26th, we want TSP policy 9.4.d (“When the existing use of a street does not comply with its classification, no additional investments should be made that encourage that inappropriate use.”) to require PBOT look for ways to minimize through-traffic flows and speeds. If 20th were a collector, for example, we could see a future PBOT seeking to relieve congestion on Division by routing vehicles north onto SE 20th, an action that would violate policy if the street remained a Local Service Street.

One of the HAND Board’s long-term goals has been to reduce the impact of drivers using the residential portions of our neighborhood as a shortcut to avoid congestion, a problem that has only been getting worse. We feel that increasing the classification of SE 20th sends the wrong message and will make further work on our goal more difficult.

Portland Comprehensive Plan policies around traffic safety, enhancing quality of life for Portland residents (i.e. making our neighborhoods “Great Places”), and Portland’s environmental sustainability goals all suggest we take efforts to reduce traffic volumes, especially through residential areas.

Please retain the current classification of Local Service Street for SE 20th, and move forward with plans for making 26th a Local Service Street.

Thank you,

Susan E. Pearce
Chair of Hosford Abernethy Neighborhood District



July 20, 2017

Comments on the Transportation System Plan Update 3, letter number 3:

The intent of this letter is not to advocate for or against any particular project, but rather to point out ways the TSP policy language could be improved using 20th & 21st as examples.

The proposal in the TSP to designate SE 20th & SE 21st Avenues as Emergency Routes (which we testified about separately) highlights conflicts between the TSP and the Comprehensive Plan, and could lead to outcomes contrary to the TSP, the Comprehensive Plan, and other city policies.

The Portland Comprehensive Plan, Policy 9.40, provides guidance for establishing Emergency Routes, and states that Portland should:

Maintain a network of accessible emergency response streets to facilitate safe and expedient emergency response and evacuation and 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.

Both SE 20th & SE 21st currently have speed bumps as traffic-calming measures, that were installed after significant advocacy and financial investment by residents and commercial properties along the respective streets. TSP Policy 6.10, Objectives A & B (describing Major Emergency Response Streets and Secondary Emergency Response Streets respectively), state that existing speed bumps "may remain temporarily, but shall be replaced with speed cushions when streets are repaved or undergo other major modifications." On Major Emergency Response Streets, the installation of speed cushions is "subject to the approval of Portland Fire and Rescue," which means the existing speed bumps could be removed from SE 20th altogether.

TSP Policy 6.5 E (a) describes safety as the "highest priority" on Neighborhood Collectors. TSP Policy 6.5 F (a) states that Local Service Streets should "maintain slow operating speeds to accommodate safe use by all modes." Since most streets that have traffic calming and would be considered for Emergency Response Street designations are either Neighborhood Collectors or Local Service Streets, these policies will conflict with removing or replacing speed bumps with less-effective speed control measures.

If PBOT assigns these new classifications to SE 20th & SE 21st, PBOT would, over time, be required to remove the existing speed bumps, and replace them with potentially less effective



devices, or, in the case of SE 20th, perhaps with nothing at all. Such an outcome would clearly violate the letter and spirit of Policy 9.40, as well as TSP Policies 6.5 E (a) and 6.5 F (a). Removing effective speed bumps does not give safety the "highest priority".

Removing or degrading traffic calming on streets where it is working as intended runs counter to these and other policies, and would set back efforts to reduce driving by making the alternatives more dangerous and less pleasant along key corridors. It would reduce livability and safety, not just for immediate residents, but for those who walk or cycle along or across affected streets, and even drivers who must contend with higher traffic speeds.

Additional questions are raised regarding SE 21st. Part of the street is a Greenway, and has speed bumps that are used to control the speed of vehicles in order to provide a safe and low-stress cycling environment. There may be conflicts between policies regarding Emergency Response Route classifications and Greenway designations where they overlap.

We therefore ask that you:

1. Modify TSP Policy 6.10 as follows:
 - a. Strike language requiring the removal of existing speed bumps without a guarantee that they be replaced with equally effective speed control devices. (Perhaps: "Existing speed bumps may be removed only if replaced with speed cushions or other devices that maintain the same or greater level of traffic speed reduction.")
 - b. Remove "subject to the approval of Portland Fire and Rescue" from 6.10 A (b) that gives the Fire Bureau a unilateral veto over replacing speed bumps on Major Emergency Response Streets. It should be incumbent on PBOT to design effective speed control devices that satisfy the needs of emergency responders while lowering traffic speeds.
 - c. Add language requiring PBOT and the Fire Bureau to prefer designating streets that have no existing traffic calming devices as emergency routes, and only turn to streets with speed bumps when they can show there are no suitable alternatives.
 - d. Clarify what happens when Greenway and Emergency Response Street designations overlap. Is this acceptable practice? Which policies take precedence?



Thank you for your consideration.

Most sincerely,

Susan E Pearce, Hosford-Abernethy Neighborhood District (HAND) chair on behalf of
the HAND board