

**OPPOSE
PROPOSAL****SAFEWAY PROPOSAL**
2-STORY GROCERY STORE8039 SW Capitol Hill Rd LU 11-103310 CP ZC ADIF YOU WISH TO SPEAK TO CITY COUNCIL, **PRINT** YOUR NAME, ADDRESS, AND EMAIL.

NAME (print)

ADDRESS AND ZIP CODE

Email

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✓ KEITH LIDEN	4021 SW 36TH PL	BAINBRIDGE 80 COMCAST. NET

**SUPPORT
PROPOSAL**

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TESTIMONY

TO: Portland City Council
FROM: Keith Liden, 4021 SW 36th Place, Portland, OR 97221
RE: Safeway LU 11-103310 CP ZC AD
DATE: January 26, 2012

PLAN POLICY – IMPLEMENTATION DISCONNECT

I have no objection to the Safeway land use application. My concerns relate to the manner in which PBOT conducted its portion of the application review. In my opinion significant portions of the TSP, Portland Bicycle Master Plan, and Portland Bicycle Plan for 2030 were misinterpreted or ignored. In short, PBOT development review was disconnected from adopted city plans and policies, which are supposed to guide the bureau's actions. In addition, the Hearings Officer described plan contents as "aspirational objectives", and because they're not mandatory, the City doesn't need to follow them.

SAFEWAY

After writing two letters and testifying before the Hearings Officer with no affect, I don't expect to change the trajectory of this land use decision. All I have to say is in the record. However, I still would appreciate clarification on four issues regarding Capitol Hill Road:

- What, if any, interim bicycle improvements will be made? Bicyclists will be worse off due to increased traffic if the street remains essentially as it is.
- Why was a compromise not considered to potentially reduce the 12-foot sidewalk width to allow for a bike lane in at least one direction? Is it because of storm water requirements?
- What is the design concept for this street if and when the opposing side is improved? Will it include bike lanes? Will the Safeway street improvements accommodate or preclude future bike lanes?
- Does PBOT recognize the huge potential that Capitol Hill Road and 19th have to provide a valuable connection across the Barbur/I-5 barrier, or are they both just another street?

FUTURE DEVELOPMENT REVIEWS

I raised the Safeway issues with the Portland Bicycle Advisory Committee (BAC), and Roger Geller took the initiative to discuss them with Kurt Kruger and the PBOT development review staff. As I understand from Roger, they developed a draft process to more adequately evaluate bicycle elements in the TSP and Bicycle Plan for 2030. I welcome this effort and hope the refinement of this process will involve the BAC and perhaps other interested parties. Moving forward with a more systematic review process, I have several recommendations.

Supporting Information

Based on the Safeway case, three additions should be contained in future staff reports and recommendations:

- **Average Daily Traffic (ADT) Information** - ADT may not be an important measure for traffic analysis, but it is critical to identify appropriate bicycle facility treatments as provided in the TSP. This information should routinely be provided and used to evaluate all TSP provisions relevant to bicycling.
- **Multi-Modal Transportation Impact Analysis** – The Safeway transportation impact analysis makes only passing mention of pedestrians and bicyclists, with no meaningful analysis of the issues and needs for these two modes in the vicinity of the Safeway redevelopment. Virtually all of the 280-page report focuses on vehicle traffic counts, needs, and solutions. How will we ever create a multi-modal transportation system (and 25% bicycle mode share by 2030) if we remain fixated on the needs of

motorists? Actions must align with policy, and the city must demand a more comprehensive approach to analyze and accommodate “multi-modal” transportation needs associated with land use applications.

- **Information Supporting Conclusions and Recommendations** – Staff conclusions and recommendations should include reference to background information being used to form them. For example, making statements in the staff report raising “proportionality” issues related to providing bicycle facilities while pedestrian, transit, and auto improvements apparently are not subject to the same scrutiny leads to the obvious question – why?

Analysis of Relevant Plan Policies, Objectives and Guidelines

Using the Safeway example, policy analysis should be more complete and comprehensive in the following ways:

- **Comprehensive TSP Analysis** – Evaluation regarding bicycle facilities should be comprehensive and not selective. The quick and dirty evaluation in my first letter represents the most comprehensive analysis in the record pertaining to bicycling. The staff appeared to “cherry pick” elements from the TSP and Bicycle Plan for 2030 to support their conclusions.
- **Clarify the Relevance of the Bicycle Plan for 2030** – During the Safeway process, I was instructed that the Bicycle Plan for 2030 was not legally relevant. However, in the staff report and Hearings Officer recommendation, the plan was used. The city should clarify the role of the Bicycle Plan for 2030 in development review. Does it count? Should it only provide spiritual guidance, and if so how?
- **Link Conclusions with Policy** - Staff reports should not leave readers guessing about what plan policies were used to reach conclusions in the staff report, such as “... current policy makes it very difficult to require the additional dedication need for provision of a bike lane,” must be supported with references to the policies leading to such a conclusion.

Storm Water Rules

The storm water requirements should be evaluated regarding how they inhibit making much needed transportation safety improvements for cyclists, pedestrians, and transit users in SW Portland. I believe we need a better balance between achieving a variety of environmental policies. The storm water requirements can easily increase the cost of sidewalk and bike lane projects by more than 50%, putting them out of reach. This is evident in the Safeway case where part of the aversion to requiring a bike lane along Capitol Hill Road apparently is associated with storm water requirements. The same is true of larger projects, such as Capitol Highway between Multnomah and Taylors Ferry Road, where storm water requirements have left everyone wondering how we’ll ever afford it.

Green streets should be as much about pedestrian/cyclist safety, air quality, and reducing the city’s carbon footprint as they are about water quality. Under current rules, streets will remain car-friendly and become fish-friendly, but pedestrians and (especially) cyclists will remain on SW Portland’s endangered species list.