



PORTLAND FREIGHT COMMITTEE

September 26, 2014

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

Dear Chair Baugh and Commission Members:

The Portland Freight Committee appreciates the opportunity to provide additional comments on the latest (Summer 2014) revised draft of the Comprehensive Plan. We recognize the significance of this plan in providing direction for City decision-making on key land use and transportation issues and setting the framework for future infrastructure investments over the next 20 years. The PFC appreciates all the hard work on part of Bureau of Planning and Sustainability staff in their efforts to address many of the issues we raised in our previous comments submitted on April 30, 2013 and the improved recognition on freight transportation. We would, however, like to specifically highlight the following policy concerns we still have with the current draft Comprehensive Plan:

Transportation Hierarchy

While we understand the Transportation Hierarchy (policy 9.6 on page 9-7) has been revised from the original proposal, much confusion still remains on its overall intent and which street classifications it would be applied to. It's also unclear on the overall utility of the hierarchy in addressing policy conflicts or how it will be applied at the project development and design levels. Since most Portland street corridors are multi-functional, street design is based on the context sensitivity of the surrounding land uses and connecting transportation network. As currently proposed, it's unclear how the hierarchy would help resolve classification conflicts and competing modal needs. Unless otherwise clarified how it will be applied, the PFC requests that the hierarchy be limited to residential districts and excluded from designated freight districts/industrial areas and along major commercial corridors.

Freight and Civic Corridors

The PFC appreciates that Freight Corridors have been included into the policy language and map in the Urban Form and Design chapter. As stated in Chapter 3: "Freight Corridors are the primary routes into and through the city that supports Portland as an important West Coast hub and a gateway for international and domestic trade." However, many designated freight routes are not identified on the map on page 3-26 and need to be included as Freight Corridors – i.e., N. Lombard Street from Columbia Blvd to Marine Drive, N. Marine Drive from Lombard to I-5, N. Portland Road, NE Killingsworth west of I-205, NE 47th Ave, NE Cornfoot Rd, NE Alderwood Rd, and NE Airport Way.

Many proposed Civic Corridors we previously identified as being in conflict with designated Priority and Major Trucks Streets are still included on the map on page 3-26 – i.e., St. Johns Bridge (US 30), MLK south of Lombard, NE Sandy Blvd, NE/SE 122nd Ave, SE Stark, 82nd Ave south of Sandy, Powell Blvd (US 26), SW Macadame Ave (Hwy 43), SW Barbur Blvd, and SW Bertha Blvd/Beaverton/Hillsdale Hwy. The PFC remains concerned that by also classifying these important freight streets as Civic Corridors will create policy conflicts

and compromise their intended function to provide truck mobility and access to surrounding commercial and employment districts along these corridors.

Emergency Vehicles and Over-Dimensional Truck Routes

The PFC believes it is essential for Portland's emergency preparedness strategies to be addressed in a specific section in the chapter on transportation. Over-dimensional truck routes are necessary for emergency response vehicles, police, fire, ambulance, tow trucks and other emergency providers to be able to reach their destinations in an efficient and timely manner. Over dimensional routes are also necessary for transporting over-sized equipment (heavy construction equipment, culverts, transit supports, building materials, etc.) A Regional Over-Dimensional Truck Route Study is currently underway and we request the results be reviewed and policies added or refined as part of the Comprehensive Plan and Transportation System Plan (TSP) Updates.

Truck Parking and Loading

Truck loading zones are an important element in the movement and delivery of goods and service throughout the City. Policy language needs to be included to protect and provide safe loading zones for delivery personnel. As part of implementing the adopted Climate Action Plan, a Central City Truck Parking and Loading Plan will be conducted in 2015 through 2016. The PFC requests that recommendations from this Plan be included in the Comprehensive Plan and TSP Updates.

Transportation System Plan Project List

The PFC advocates that the TSP remain a list of 20 year transportation needs and not as a programming document for allocating short-term transportation funding. The TSP is a list of projects that are in response to the needs of the overall transportation system. Setting project priorities is determined by PBOT leadership and once priorities are established the TSP can be used as a resource to determine what projects can fulfill their priorities. Once priorities are set then the TSP can be used as a project resource to commit to funding projects that follow these priorities.

Thank you in advance for consideration. The Portland Freight Committee would appreciate the opportunity to collaborate with in any way we can to work through our policy differences as well as support you in the areas of agreement.

Sincerely,



Debra Dunn
PFC Chair



Pia Welch
PFC Vice Chair

Cc: Steve Novick (City Commissioner)
Leah Treat (PBOT Director)
Susan Anderson (BPS Director)
Art Pearce (PBOT Policy, Planning and Projects Group Manager)