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October 30, 2014

Portland Planning and Sustainability Commission
Andre Baugh, Chair
Submitted via email: psc@portlandoregon.gov

RE: City Club Comments on Comprehensive Plan Proposed Draft

Dear Chair Baugh and Commissioners:

On behalf of the City Club of Portland Bicycle Advocacy Committee, I am pleased to submit these comments on the Proposed Draft of the City's Comprehensive Plan.

In May 2013, the members of the City Club of Portland overwhelmingly adopted a research report that clearly endorsed the role of bicycles as an integral part of Portland's transportation system. The report called for more strategic planning for bicycle infrastructure, and specific steps the City should take to make bicycling safer and more attractive for more residents. Following the report's adoption of the City Club created the Bicycle Transportation Advocacy Committee to pursue its adopted recommendations. (Read the report at <http://bit.ly/pdxcityclub-bikes>.)

Overall, the Committee is supportive of the direction of the Proposed Draft.

We support a strong link between land use and transportation. We appreciate in particular that the Plan explicitly recognizes the role of streets as both public spaces and transportation links for all users, and we appreciate its emphasis on a "safe, comfortable, and accessible" bicycle network for "people of all ages and abilities," especially its explicit links to important Centers and Corridors throughout the city's land use hierarchy. As you know, better land use is key to better transportation.

We support the comprehensive nature of the Plan – its inclusion of the entire city in a single plan covering both infrastructure and land use. We appreciate the strong effort to link land use and key infrastructure investments. The Urban Design Framework that illustrates how public infrastructure investments and private development will result in a focused and evolving city structure.

We strongly support the efforts to include all Portlanders in City plans and especially the emphasis on equity. Chapter 2 on Community Involvement is strong and represents a good commitment to equity and inclusion in land use decisions. The goals of the chapter are strongly inclusive and comprehensive.

We do have a number of concerns, however, that we would like to highlight for the Commission at this time.

Despite the overall strength of Chapter 2, its description of Community Involvement is incomplete. The chapter's policies appear limited are limited to land use decisions and processes. There is no indication as to whether transportation infrastructure and other investment decision processes will be equally inclusive. City Club's research report concluded that the city needs to be more inclusive in its planning for transportation, especially for bicycle infrastructure. By inclusive, the report meant both demographic (race and other historically underrepresented groups) and modal inclusiveness. Over the years, a number of projects have suffered because they failed to be truly inclusive in their planning and execution.

Elsewhere the Plan does propose to integrate transportation decision-making with other infrastructure and with land use. Yet Chapter 2 does not identify how this will happen with community involvement. This is a major failing that should be corrected before the Plan goes to Council.

In general, the Comprehensive Plan should provide greater clarity on the public investment choices and direction. Given the state of public finances, the Plan does not provide clear enough priorities on how the City will make investments in transportation and other infrastructure needs. We are concerned that this risks a lack of coordination among city bureaus and other government actors who are investing in infrastructure improvements, as well as conflicts between public and private investments. The list of Significant Projects appears to be a compilation of bureau lists rather than a coordinated set of investments, which is likely to be an ongoing source of confusion and disagreement in the future. We urge you to work with staff from all the concerned bureaus to resolve this issue before the final draft.

We generally support the modal hierarchy in Chapter 9, which would place vulnerable users at the top of the city's concerns when planning infrastructure investments and improvements. We realize this can be difficult to measure, and yet we see it as an important orientation for the City to take. However, we urge you to use this Plan to endorse a clear Vision Zero policy for the city's transportation system. We also urge you to work with PBOT to develop a policy limiting auto through-traffic on the city's network of neighborhood greenways, where bicycling and walking are intended to be priority modes.

We recognize why freight has been removed from this modal hierarchy due to its own special needs, but we are concerned that the policies concerning freight in Chapters 6 and 9 could potentially put it in direct conflict with bicycling and other mode users, with no obvious resolution proposed in the Plan. We suggest you find ways to resolve this tension. We urge you to pay special attention to those "choke points" between different modes' priority networks – and to look for solutions that emphasize safety and comfort for everyone.

Additionally, we are concerned the Proposed Draft lacks sufficient measures for success or a process for evaluating plan effectiveness in future years. While previous Comprehensive Plans and district or other special plans included evaluation processes that were clearly not achievable given city resources, there should still be some method for measuring progress. Sometimes measures are listed in the "Why is this important?" section – for example, 80 percent of Portlanders live in complete neighborhoods by 2035 – but they should be gathered into a single place, such as the Administration chapter.



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Finally, we are concerned that the Proposed Draft is insufficiently relevant to most Portlanders. It is fairly clear within itself, and perhaps to the well-informed reader. However, the Plan does not adequately explain its relationship to other city, regional and state plans and policies in a way that will be comprehensible to most residents. Because the city and the region have so many other adopted plans, these relationships are important and there is a great potential for confusion and lack of clarity. This is especially true for someone who is trying to follow the city's strategy from the Bicycle Master Plan to the Comprehensive Plan, for example. The two charts in Chapters 1 and 9, which are similar but neither the same nor directly linked to each other, are not very helpful in explaining the relationships. We advise you to make these connections clearer.

We have a number of specific comments concerning policies in the draft Plan, which we share in the pages below. Although bicycling is wisely sprinkled throughout the plan, other policies throughout the draft Plan seem to miss good opportunities to include bicycles as a key ingredient in healthy and prosperous place-making and mobility. We hope you will find in our suggestions good opportunities to do so.

We have decided to refrain from specific comments on the significant project list until a later date, as we have not had sufficient time to review the recently released list. We look forward to providing those comments to you in writing at a later date.

Thank you for the opportunity to comment and for your work on creating a meaningful, actionable Comprehensive Plan. We look forward to continuing to be active as the Plan continues toward finalization and adoption in 2015.

Respectfully submitted,

Craig Beebe
Chair, Bicycle Transportation Advocacy Committee
City Club of Portland

Specific Comments by Chapter

Chapter 1

Relationship to other plans (Bicycle and Pedestrian Master Plans, etc.) or to street design guidelines and documents like the Skybridge policy is not clear. Policy 1.15 mentions the role of area plans but is silent as to the modal plans and other specialty plans done by the City and its bureaus.

Chapter 2

See general comments above. The limitation of this chapter to land use could be resolved by removing the limitation to “land use process” or “land use project.” Alternately, the language could be amended to include infrastructure decision-making or a reference to the policies used for infrastructure could be included as a separate statement.

Policy 2.1e mentions the inclusion of “Interest and affinity organizations and groups” as Partners in decision-making. We assume that the various modal organizations – and groups interested in affordable housing, for example – are included in this category. Is this correct? This could be clearer.

Chapter 3

Policy 3.8 calls for the evaluation of “the impacts of land use decisions on neighborhoods and current residents, particularly under-served and under-represented communities.” This evaluation should include infrastructure facilities as well as land use.

Policy 3.16 Center Connections is right to emphasize bicycle connections between centers; however we urge the addition of language that specifies that these bicycle routes are “safe and direct.”

Policy 3.31 appears to erroneously refer to “Town Centers” in its final sentence.

Policies 3.38-3.41 Civic Corridors: We recognize the role of Civic Corridors in our city’s network, and we cautiously support the idea of “parallel routes” as described in Policy 3.40. However, for reasons of access and economic development (customers and employees) it is important that such routes be well connected to the Civic Corridors. Thus we urge that Policy 3.40 be amended as follows:

Improve Civic Corridors as key mobility corridors of citywide importance that **safely and comfortably** accommodate all modes of transportation within their right-of-way or on nearby parallel routes. **Where parallel routes are used for bicycling, there should be frequent, well-signed and convenient connections to businesses and other destinations on Civic Corridors.**

Policy 3.42 on neighborhood corridors should explicitly mention bicycles. Since these corridors are designed to serve immediately adjacent residential areas, the bicycle is an ideal mode for the short trips needed to access the local commercial areas.

Policies 3.43-3.49 on transit station areas should include a mention of safe and secure bicycle parking and/or bike share facilities where appropriate. The City should be a partner with TriMet in designing and creating station facilities that make bicycling convenient for the first and last few miles of a transit trip. We see language of this nature included in Policy 9.53 but it makes sense to mention it here as well.

Policies 3.50-3.53 on City Greenways seem to largely answer our concerns on the Working Draft. It is wise to differentiate these from the “neighborhood greenways” that PBOT is already implementing, though the use of the “Greenways” term in this Plan could still be confusing to the casual reader. Additionally, though the text says, “additional policies related to Greenways are in chapter 9,” we are not clear on where specifically those additional policies are located.

Policy 3.80 Inner Neighborhoods Active Transportation should mention links *between* neighborhoods, not just to the Central City.

Policy 3.86 Eastern Neighborhoods Active Transportation should specifically mention the numerous missing links in this part of the city as something that requires high priority and early correction.

Chapter 4

Policy 4.6 Active Living should be more specific about what is meant by “building and site design that promotes active living.”

Policy 4.19 Pedestrian and Bicycle Access is strong, but could include mention of secure bicycle parking.

Chapter 5

We are pleased to see numerous linkages between transportation access and housing quality and affordability in this chapter.

Policies 5.19, 5.20 and 5.21 all deal with housing location. We are pleased to see “access to active transportation” included in the list of criteria. We urge you to amend this to “safe active transportation”. Even areas that are poorly served with sidewalks and bike facilities today still have many people walking. The City should prioritize safe facilities wherever possible.

Policy 5.44 Walkable Surroundings should be amended to “Walkable/Bikeable Surroundings.” Neighborhood greenways and crosswalks should be added to the list of things to develop in these areas.

Chapter 6

Policies 6.53-6.58 describe Campus Institutions as a newly-designated land use type and zone. We support the unique recognition of these areas. But there should be an explicit mention and emphasis on bicycling and walking as a mode of access, especially since many of them will draw from adjacent

neighborhoods and some of them are not on major transit or road corridors. Part of creating sustainable campus institutions will be active and sustainable transportation.

Chapter 7

No comments.

Chapter 8

Policy 8.27 Community Involvement is too abbreviated to be an effective description of community involvement for infrastructure. See Chapter 2 for more complete comments.

Policy 8.34 Transportation Function should explicitly mention that providing for active transportation modes is one of the roles of the public rights of way.

Policy 8.77 and 8.78 Establish a system of public trails, coordinated with the City Greenway system. We support these goals but believe that the trail system should be coordinated with the full city bicycle and pedestrian networks, not just the City Greenway system. In addition, we note that there is no definition of a public trail in the glossary.

Policy 8.99 School Access: We are pleased to see the inclusion of bike and walk access in considering school site locations and attendance boundaries. We suggest adding working with school districts to ensure that every school has multiple safe walking and bicycling routes to it, and ample secure bicycle parking available on-site.

Chapter 9

We broadly support the goals mentioned here, particularly the emphases on place-making (9B), equity (9D), health (9E) and safety (9G). However, we believe there should be mention of keeping and funding a well-maintained transportation system. This might be included within another goal, or it might be separated out.

9.6 Modal Hierarchy: We understand the unique needs of freight and the reasoning behind removing movement of goods from this hierarchy, which as we stated in our general comments we broadly support. However, we have concerns that the language in Policy 9.6 concerning the hierarchy may sometimes be in conflict with the language in Policy 9.7 and related policies concerning freight movement. We do not see a clear resolution between the needs of freight users and those of vulnerable road users like bicycles and pedestrians in the Draft. We suggest that the Plan seek to strike such a balance and provide guidance to avoid future conflict.

Policy 9.8: We are pleased to see this focus on affordability, particularly for groups that have traditionally been underserved. In practice this should include safer bicycle connections between neighborhoods outside of the downtown core.

Policies 9.21-9.23 concerning the bicycle network are fine, but incomplete. We remind you of our comments regarding the addition of a policy limiting auto through-traffic on neighborhood greenways. See our general comments above.

In the system management policies 9.42-9.47 we urge you to consider the issue of modal interchanges – where priority routes for one or more modes intersect. These “choke points” are critical areas of conflict and reduced safety for all road users. We advise adding policy language that reiterates or clarifies the modal hierarchy at these choke points. Wherever possible, we urge physical separation of modes for everyone’s safety and comfort.

Policy 9.54 Coordination could include stronger mention of the City’s role as a regional leader in transportation decision-making at that level, as the Plan describes concerning housing in Policies 5.37 and 5.38. City elected officials and staff serve on JPACT, MPAC and other advisory groups at Metro, and often represent the City on key steering committees. The City should not only coordinate with Metro, it should lead to further its stated policies at these venues as well.

Policy 9.58 Project Selection Criteria: This is a strong policy and we are glad to see the list of goals included, as well as the intention to better integrate transportation projects with other City bureaus’ work. We suggest adding language concerning using quantitative data where possible to guide prioritization: not as an exclusive criterion but as one of several tools that can ensure the effectiveness mentioned earlier in this policy. Similarly, Policy 9.56 should include measurement of transportation demand management programs.

Policy 9.59 Funding should include maintenance, as in “Encourage the development of a range of stable transportation funding sources that provide adequate resources to build **and maintain** an equitable and sustainable transportation system.”

Chapter 10

Policy 10.5 provides a paragraph description of each land use category on the Comp Plan Map. These descriptions are usually silent on the role of bicycles, though they often speak of transit access and pedestrian orientation. Access to bicycle networks, and/or internal bicycle safety should be included for several of these area descriptions. We recommend that the following descriptions include mention of the role of bicycle transportation:

1. Open Space: Bicycle access via trails or other bike/ped facilities
- 5-7 Single Dwelling 5000 or smaller
- 7-12 Multi-dwelling residential
- 13-20. Mixed Commercial and Employment uses, including Institutional Campuses.