

February 24, 2015

**TO: PORTLAND PLANNING AND SUSTAINABILITY COMMISSION**

**FROM: TRANSPORTATION SYSTEM PLAN EXPERT GROUP**

**SUBJECT: COMMENTS ON PROPOSED DRAFT 2035 COMPREHENSIVE PLAN**

## **CONTEXT**

The City of Portland's 23-member Transportation Expert Group (TEG) was jointly convened in January 2014 by the Bureau of Planning and Sustainability (BPS) and the Bureau of Transportation (PBOT) to provide input on revised transportation goals and policies in the Proposed Draft Comprehensive Plan and on implementing elements of the City's 2035 Transportation System Plan (TSP). The TEG process builds upon the work of the Networks Policy Expert Group (PEG) convened by BPS and BPOT to advise on the transportation element of the Working Draft Comprehensive Plan. Areas of TEG input have included TSP public outreach, transportation related goals and policies, project selection criteria and evaluation process, project list priorities and financial plan, street classification map updates, design and implementation of a transportation hierarchy, Citywide parking strategy, and changes to Code to implement the TSP, e.g. street design guidelines. Input has also been provided on PBOT's Two-Year Action Plan and Our Streets initiative.

## **LIMITATIONS**

These remarks have been prepared by the TEG Facilitator, Jim Owens, to reflect his understanding of the general sense of the group. While informally endorsed, they have not been voted on and individual members may not fully agree with their substance. Additionally, individual members may be submitting more detailed comments on specific proposed policies and projects.

## **POLICY DIRECTION**

The former Networks PEG submitted detailed comments on Working Draft goals and policies; those comments served as the starting point for the TEG's review of Proposed Draft goals and policies. In general, the TEG believes that the Proposed Draft goals and policies adequately respond to the Networks PEG comments. At the same time, TEG members had numerous comments on Proposed Draft goals and policies; these are attached with the caveat that they are individual TEG member comments rather than comments from the larger group.

General comments and recommendations on Proposed Draft policy direction include:

- Overall support for the overall transportation system policy direction represented by Proposed Draft goals and policies, projects and programs, and specifically policy direction that:
  - Recognizes the role of the transportation system in supporting local and regional economic growth.
  - Targets growth and investment to centers and corridors.
  - Reduces carbon emissions associated with the transportation sector.
  - Promotes equitable transportation investments.
- While there is an understanding that this is at the direction of the City Attorney's Office, concern that policy language in many cases has been edited to be less directive and is too "wishy-washy" with terms like "encourage," "support", "promote", "coordinate", etc. The TEG feels that policy statements should be more assertive and affirmative, e.g.. "Secure a range of stable transportation funding sources...."
- Concern that while the Proposed Draft assumes coordination among city bureaus to accomplish Plan objectives, in real life the experience is that all too often the opposite is true. This has often hampered progress in providing transportation facilities in a timely and cost-effective way. It's not clear how this policy direction will be meaningfully implemented.
- Perhaps the TEG's most significant concern is the absence of a clearly articulated process and criteria for resolving conflicts among policies, classifications, modes, etc. The Proposed Draft identifies a multitude of centers, corridors, transit station areas, City Greenways, urban habitat corridors, employment areas, pattern areas without any mention of how they will be reconciled with and against each other.
- While supporting the concept, concern that the proposed transportation hierarchy fails to recognize the continuing role of autos and freight and is absent a strategy to resolve conflicts among modes. As drafted, the weighing of modal transportation needs within a "hierarchy" sends the wrong message by implying that motor vehicles will be shunned, and perhaps not even accommodated on some streets. In practice this will not be how it works. There needs to be more guidance on how this hierarchy will be used.
- Recommendation that the City take a more assertive role regarding transit. Rather than just "punting" that responsibility to TriMet, the City should work directly with TriMet in defining the future transit network.
- Request that trails be recognized as part of the transportation network.
- Concern that while proposed policies recognize the role of the Willamette and Columbia rivers as transportation infrastructure, there are no specific strategies and projects to implement this policy direction.
- Concern that there is inadequate discussion of safety for all modes, but particularly the need to create a safer pedestrian system. Safety is more than connectivity.

- Concern that there is inadequate emphasis on regional coordination and existing classification conflicts across jurisdictions.
- Concern that proposed parking policies are premature given the recent launch of a Citywide Parking Strategy.

## PROJECTS AND PROGRAMS

The TSP project selection process and resultant project list has been a primary focus of this phase of the TEG process, with two special exercises to apply draft criteria to model projects. TEG input has helped shape the evaluation criteria and has led to the establishment of a programmatic category to target funds to smaller projects. By design, the TEG has not reviewed individual projects and offers no comments on specific priorities.

TEG comments on the project evaluation process and criteria, resultant project list and program categories, and Financial Plan include:

- Recognition that the project evaluation and prioritization process developed for the 2035 Comprehensive Plan is an experiment that will need to be tested and refined over time. It is a much improved approach to project selection and PBOT should be applauded for its innovation and commitment to integrating the TEG and other parties into its development. At the same time, there is recognition that many parties are confused by the project evaluation process and concerned about the resultant prioritization. It is also clear that many are unaware that smaller projects are being included in Citywide Program categories rather than on the project list and that the project list will be updated, through a public process, approximately every five years. As might be expected with a process that has evolved piecemeal over time, understanding what has been developed by the bureau has been a "catch-up" exercise that has frustrated some. Clear, non-jargon information is needed on how the project evaluation criteria will be used and what other factors will be considered in project and program selection. Details on how the project lists will be updated are also needed.
- Request that the TEG continue to be involved in refinement of the project evaluation and refinement process. While the TEG participated in a "test drive" of the evaluation criteria, it has not had an opportunity to review actual application of the final version with real live projects.
- Support for the use of outcome-based criteria to evaluate Major Projects and Citywide Programs. In most cases, funding projects that achieve multiple benefits is a wise use of limited resources. Using evaluation criteria can also identify projects or programs that score well on only a few criteria, but may serve a critical role in achieving key outcomes. The set of criteria developed through consultation with the TEG seems to work well in recognizing projects that are likely to do the most to improve safety, health, equity, access, and economic benefit
- Support for establishment of categories of Citywide Programs to ensure that the Bureau effectively prioritizes, funds, and delivers smaller, cost-effective projects. More detail is needed on the nine Citywide Programs. Small projects proposed to be moved from the major project list should be

shown on citywide program reference lists. Small projects proposed through public input should also be evaluated for inclusion on future citywide program reference lists.

- Support for PBOT's work to realistically forecast future revenues. Doing so will force the Bureau to identify which projects and programs deliver the greatest benefits, and to report more realistic performance results.
- Support for a five year "project pipeline." By identifying high priority short-term projects, the Bureau can be better prepared for grant applications with more fully developed projects. We recommend the project pipeline include both bundles from citywide programs and major projects.
- Concern about correlation of lists in the Comprehensive Plan and Map App. The project list (without a map) in the Comprehensive Plan does not coincide with those shown on the Map App. One consolidated list and map(s) is needed.
- Recommendation that PBOT develop a program of regularly reporting on the performance of the draft constrained project and program lists, including how projects and programs support the Comprehensive Plan focus on centers and corridors, and job centers. Performance modeling for access/mobility, mode share, vehicle miles travelled, greenhouse gas emissions and other factors should be developed and publicly shared.

## **PUBLIC OUTREACH**

The TEG has also advised on how best to present succinct but comprehensive information to the public about the TSP. Among its suggestions, the TEG noted that the relationship of the TSP and other transportation-related projects (e.g., 2035 Comprehensive Plan, Our Streets, Two-Year Action Plan, TriMet service enhancements) needs to be better explained. It has also suggested that it is critical to explain that City transportation projects are part of a larger transportation system influenced and controlled by Metro, ODOT, and others.

Perhaps because of a lack of clarity about the bureau's TSP public involvement efforts, the TEG's role in advising on TSP public involvement has also not been very clear. For example, how the TSP outreach efforts meshed with the overall Comprehensive Plan engagement strategies remains unclear. The bureau's Public Involvement Plan always seemed to be a work in progress and at some points it seemed like PBOT wasn't taking advantage of the extensive work BPS had created with the Portland Plan and earlier versions of the Comprehensive Plan and coordinating closely with BPS staff on what groups to contact. It was also unclear how the bureau responded to TEG suggestions on which groups to contact.

The greatest public involvement concern is about the abbreviated timeline for comments on proposed projects and programs. Although staff attempted to touch many bases in a short time these past few weeks, the presentations were limited in what they could accomplish. TEG members and the groups that they represent have expressed great frustration with this element of the TSP update process. While there are likely many valid reasons for the abbreviated ("impossible" according to some) review process, not the least of which being the PSC hearing schedule, the concern is that public awareness of,

input on, and support for other aspects of the TSP update process could be negated by the inadequate opportunity for review.

Despite these concerns, the TEG strongly supports the broad public outreach conducted by PBOT and BPS to neighborhood coalitions, business associations and underserved communities. It urges PBOT to continue these efforts throughout the TSP update process and beyond. It also urges PDOT to implement an ongoing program of education and outreach to underserved communities. It is critical that ongoing relationships with these groups be maintained, rather than just "touching base" when it's necessary to meet public involvement requirements. We look forward to being partners with the bureau in informing and involving the public in finalizing transportation goals and policies, refining projects and programs, and developing the remaining components of the TSP.

Thank you for consideration of our comments.

On Behalf of the Transportation Expert Group  
Jim Owens, Facilitator

**ATTACHMENT: COMPILATION OF INDIVIDUAL TEG MEMBER COMMENTS**



## ATTACHMENT

# COMPILATION OF INDIVIDUAL TEG MEMBER COMMENTS PROPOSED DRAFT COMPREHENSIVE PLAN

### General Comment

The Proposed Draft is a well-crafted document with lots of positive changes from the current Comprehensive Plan. I do agree with the observations of several TSP TEG members that in some cases, the policy language is too "wishy-washy" with terms like "encourage," "support", etc.

### Chapter 1: The Plan and Guiding Principles

- This contains a bullet list regarding the intent of the plan. The last bullet acknowledges the importance of "consistency and coordination among agencies." This is fine, but it needs to include coordination between city bureaus. Generally speaking, the plan assumes coordination is occurring between city bureaus when all too often quite the opposite is true. This has often hampered progress in providing active transportation facilities in a timely and cost-effective way. I can provide over 10 examples in SW Portland along where coordination has been poor and bike/pedestrian improvement opportunities lost.
- **Policy 1.1 Comprehensive Plan:** Speaks about plan maintenance. It needs to stress adopting modal and other plans promptly and not letting them languish for years as "unofficial" city documents of limited influence. An example is the *Portland Bicycle Plan for 2030*, which was completed in early 2010, and is still not adopted or officially recognized. It will practically need an update before it is finally adopted as an official part of the TSP and Comprehensive Plan.

### Chapter 3: Urban Form

- The chapter identifies a multitude of centers, corridors, transit station areas, City Greenways, urban habitat corridors, employment areas, pattern areas. How will they be reconciled with and against each other?
- **Policy 3.20 Transportation hub:** should refer to "... the region's *multi-modal* transportation hub..."
- **Policy 3.41 Freight:** Maintain freight mobility, freight access, and freight capacity on Civic Corridors that are a Iso Major or Priority Truck Streets. Most of the Civic Corridors are also Major or Priority Trucks Streets. Since there is so much overlap there should be more specific guidance on how freight mobility, access, and capacity will be maintained. The Civic Corridors that are also Major or Priority Truck Streets include Sandy Blvd., 82<sup>nd</sup> Avenue, 122<sup>nd</sup> Avenue, Powell Blvd., MLK Blvd., Barbur Blvd., Beaverton-Hillsdale Highway, St. Johns Bridge, Macadam Ave. and Stark Street (east of 82<sup>nd</sup>). Other policies that address Civic Corridors such as Policy 9.28: Prosperity and Growth, which discusses expanding street car service on Civic Corridors, may be in conflict with this policy.

By 2040 the amount of freight moving, into, out of and within the region will double from 2007 levels. This increased amount of freight traffic will need to be planned for.

The statement about the importance of Freight Corridors is good. However, the reader is referenced to Chapter 9, where there is no mention of Freight Corridors.

- **Policy 3.42: Multiple roles** (lame name for this policy): This policy talks about main streets (neighborhood corridors) without explaining their function. For instance, is it possible for couplets to act as neighborhood corridors?
- **Freight Corridors (GP 3-14):** Freight Corridors must still allow employees and customers to access businesses and other destinations along the corridor safely using all modes, including bicycles and pedestrians, not just trucks and automobiles. This is an equity issue, and one that will become absolutely relevant if the city has any hope of meeting its future mode split targets. One way to change the language to reflect this may be:
  - 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. ~~While the forms of~~ These streets are ~~not expected to change significantly, they are~~ integral to the growth of traded sector businesses such as manufacturing, warehousing and distribution industries. *In some cases, they may need to be upgraded to allow all modes to access destinations along the corridor, including employees and customers using bicycle and pedestrian modes or transit.*
- **City Greenways (GP 3-15):** The city needs to enact a specific policy for neighborhood greenways that specifies that motor vehicles are guests only on these streets, and indeed that they are open to motorized vehicles for local access only. This needs to be implemented by installing traffic diverters every 2-5 blocks along neighborhood greenways (where the grid is intact) that would allow bicycles & pedestrians to continue, but force motorized vehicles to turn and find another route (where a reasonable parallel route exists).
- **Policy 3.77 Inner Neighborhoods street patterns:** Alleys need special mention within these policies, as they have been neglected by City policy for too many years. New development must use alleys to provide auto access to properties where alleys exist, even if this means making modest improvements to the alleys.
  - **Inner Neighborhoods street patterns.** Preserve the area's urban fabric of compact blocks and its highly interconnected grid of streets, *including alleys where they exist. Where alleys do exist, do not allow new curb cuts on streets – require property auto access to off-street parking only from the alley, to protect the pedestrian environment on the sidewalk and preserve the neighborhood alley infrastructure.*
- **Figure 3-2:** is difficult to interpret. Can corridors have more than one designation, such as civic corridor and freight corridor? Also, the titles for this figure and Figure 3-3 are reversed.

- **Figure 3-3:** The Freight Corridors are poorly mapped in light yellow. Since there is overlap with Civic Corridors they cannot be distinguished.
- **Figure 3-5:** doesn't include any "enhanced greenway corridors" in SW Portland. Why? This seems particularly strange given the description of SW Portland as having lots of green, ravines, hills, natural areas, etc. Terwilliger would appear to be an ideal candidate, for example.

#### Chapter 4: Design and Development

- **Policy 4.11 Alleys:** This policy is great, except that it needs to be mandatory in order to be effective where alleys do exist. What the City needs, at this point, is a concerted effort to revitalize its alleys, especially in areas where they have long experienced neglect, to allow them to become viable locations to construct accessory dwelling units and serve other community needs.
  - **Alleys.** *Encourage Require* the continued use of alleys for parking access, *where they exist*, and expand their use as the location of accessory dwelling units and as multi-purpose community space.
- **Policy 4.15 Walkable scale:** Is it appropriate for a Town Center to focus "higher-density housing in the core" when the majority of the core is in an Historic District? Growth impacts to historic community assets need to be acknowledged - and avoided.
- **Policy 4.16 Street environment:** Specifically call out awnings as something that should be provided in pedestrian corridors. Too many buildings do not include awnings, probably because modern architecture often fails to recognize their functional value. The code must thus compensate for this architectural fad, and require buildings in centers and corridors to provide awnings.
  - **Street environment.** Encourage development in centers and corridors to include amenities that create a pedestrian-oriented environment and provide places for people to sit, spend time, and gather. *Buildings should have awnings to provide shade and protection from the rain for pedestrians and other users of sidewalk space.*

#### Chapter 5: Housing

**Policies 5.23 - 5.38 Housing affordability:** These policies cover various aspects of housing affordability, but they don't cover the cost of transportation and the importance of providing low-cost transportation alternatives, such as bicycling, walking, and transit. Policies under Health and Safety begin to address this, but not completely, in my opinion.



## Chapter 6: Economic Development

- **Policy 6.23 Trade and freight hub.** While it is good for the economy for Portland to be a trade and freight hub, it is bad for the environment and for the health of the population. As such, the City needs to establish a goal to move towards zero emissions for the traded sectors and freight/goods movement. Setting this goal now will allow predictability for businesses in the future, so they can work with the City to achieve this goal over the course of multiple decades.
  - **Trade and freight hub.** Encourage investment in transportation systems and services that will retain and expand Portland's competitive position as a West Coast trade gateway and freight distribution hub, *while transitioning towards a goal of zero emissions in this sector.*
- **Policy 6.42 Multimodal freight corridors:** refers to "multi-modal freight corridors." What does this mean?
- **Policies 6.53 – 6.58: Campus Institutions:** There is no mention in this section about mitigating transportation and parking impacts. Policy 6.55 uses the term, "adequate infrastructure," but, for example, in NW there are no real opportunities to add to the existing rights-of-way. How does a growing institution impact the surrounding neighborhood in this circumstance?

## Chapter 7: Environment and Watershed Health

- Earlier, I had objected to the chapter title of "Watershed Health and the Environment" because it implied that watershed health was the most important and the other environmental issues, including air quality, green house gas emissions, were secondary. Although the title ordering has been reversed, *I continue to be concerned that watershed health trumps other environmental objectives in practice.* A couple years ago, I brought the issue to the attention of the city and BAC. BES storm water quality requirements essentially make it much more difficult and costly to provide bike lanes because widening a street is considered "bad" and subject to water quality requirements. This often makes such improvements cost-prohibitive. SW Capitol Hwy. is an example of a city-sponsored project, and the Walgreens and Safeway developments on Barbur Blvd. are private development examples where bike lanes were not provided (in spite of TSP policy and mapped designations), largely due to the associated storm water requirements. Now, the intersections are permanently compromised for safe bicycle use.
- **Policy 7.12 State and Federal Coordination:** should be modified to emphasize inter-bureau coordination and cooperation.
- **Policy 7.24 Impervious surfaces** (p. GP7-11) should be modified to acknowledge that impervious surfaces to promote active transportation are environmentally beneficial and deserving of a more balanced and flexible approach.

## Chapter 8: Public Facilities and Services

- **Goal 8.D Public rights-of-way:** Allowing “public and private utilities” without qualification opens up the right-of-way for all kinds of Google, cable TV and other structures that obstruct the pedestrian realm. This gets “sticky” quickly and need not be addressed in a goal, but perhaps should be addressed elsewhere. Other than Policy 8.35 “Utility function” private utilities do not seem to be addressed.
- **Policy 8.7 Internal coordination:** (p. GP8-11) notes the importance of internal city agency and bureau coordination “as appropriate.” When would this not be appropriate? This needs to be emphasized as a major theme in the plan especially in this time of dwindling resources. *The city needs to stop wasting money due to uncoordinated public improvement projects.* An example: BES recently finished intersection improvements along Terwilliger (at SW 7<sup>th</sup> and SW Chestnut, which are 200+ feet apart) to address storm water issues. Between these streets, the SB bike lane on Terwilliger drops creating a serious gap, which has been identified for years. So although the city had the right-of-way, crews and equipment on-site to close this bike lane gap (and the urging of several SW residents well before the project started), it did not. To make matters worse, the new sidewalk at 7<sup>th</sup> will need to be partially removed to provide the bike lane in the future!
- **Policy 8.17 System capacity:** Providing public facilities and services “as physically feasible and as sufficient funds are available” means that growth can continue to happen if funds aren’t available?
- **Policy 8.29 Resource efficiency:** This goal is very vague, and needs to have stronger language with specific goals. An achievable policy goal would be net-zero carbon emissions from City vehicles and properties, especially by the plan’s target year of 2035. Setting such a goal would place Portland at the vanguard of cities willing to do something tangible about climate change; it would also come with a host of co-benefits for Portlanders, including better public health outcomes.
  - **Resource efficiency.** Reduce the energy and resource use, waste, and carbon emissions from facilities necessary to serve designated land uses. *Public facilities will have net zero carbon emissions from fleets, buildings, and other emissions sources.*
- **Policy 8.37 Commercial uses:** This policy is very problematic. It’s a significant new policy direction that allows even more use of the limited right-of-way for sidewalk cafes, street seats, outdoor sales, “art” such as horses, pigs, and cows. Who gets to define the conflicts that are to be minimized?
- **Policy 8.42 Undergrounding:** This policy is a bit vague and could have more teeth. For a variety of reasons, including resiliency, undergrounding would be a good city-wide policy, but it won’t happen without effort. Requiring undergrounding, and having a policy to accomplish it block-by-block whenever the street is opened, would make it feasible to actually accomplish this goal within our lifetimes. New drilling and installation technologies may allow for undergrounding to occur at a cost far cheaper than was previously available.

**Undergrounding.** Encourage Require undergrounding of electrical and telecommunications facilities within public rights-of-way, especially in Centers and along

corridors where multi-story development is allowed. *Work with utilities to achieve undergrounding whenever the street is opened, even in single-family neighborhoods.*

- **Policy 8.43 Right-of-way vacations:** Because the word “need” can be taken different ways by different people, it should be clarified: if a particular ROW does or could serve as a link in the local pedestrian/bicycle network, then pedestrian/bicycle facilities shall be required.
  - **Right-of-way vacations.** Adopt and maintain City code that identifies when street vacations are appropriate. That code should:
    - Maintain existing rights-of-way unless there is no existing or future need for them.
    - Require pedestrian or bicycle facilities, if needed *the ROW serves or could serve as a connection in the neighborhood pedestrian and/or bicycle network.*
- **Policy 8.43 right-of-way vacations:** calls for adopting and maintaining city code provisions regarding ROW vacations. It mentions “require pedestrian or bicycles facilities, if needed.” This wording seems awfully vague. Who determines need? Adjoining property owners? Shouldn’t important connections be identified in a plan? This issue may be most important in SW and outer E Portland where undeveloped street ROW can present significant opportunities to provide a more interconnected and convenient active transportation system. This policy should be clarified.
- **New Policy, perhaps 8.105?** The City should be actively seeking to produce sustainable energy on buildings, facilities, and lands that it owns or controls. The current power portfolio of the City’s power sources is weighted currently very heavily to fossil fuels; one way to make this portfolio more renewable is for the City itself to begin generating more sustainable energy. Doing so could have direct financial, environmental, and economic benefits for the City.
  - **Production.** *Maximize opportunities to produce sustainable energy within the city, especially on city-owned facilities, through solar, wind, hydro, geothermal and other renewable energy production technologies.*

## **Chapter 9: Transportation**

- **Policy 9.5 VMT reduction:** Should also address reducing vehicle hours of delay due to cost of congestion as well as contribution of congestion to air pollution.
- **Policy 9.6 Transportation hierarchy for people movement:** this hierarchy, if implemented, will represent a major shift in transportation for the city. My question is how will freight fit into this? As observed during the last TSP TEG meeting, describing the weighing of modal transportation needs with a “hierarchy” sends the wrong message by implying that motor vehicles will be shunned, and perhaps not even accommodated on some streets. In practice this will not be how it works. Some other term and diagram, which will more closely resemble how this will be implemented in practice would be a better idea and promote clearer understanding regarding the intent. I fully support the intent of this policy and decision-making framework, and I believe, if done right, will be a valuable

tool for thoughtfully and appropriately accommodating the transportation needs of city residents and businesses.

- Not sure how this will be implemented when 80% of system users are the last priority. And, although this hierarchy doesn't include freight- there will still be conflicts when trying to implement these policies on freight routes. There needs to be more guidance on how this hierarchy will be used.
- **Policy 9.15 Repurposing street space:** The existing language in this policy seems to support removing links from the transportation network. Rarely, aside from cul-de-sacs that don't actually front on properties with driveways, would it be possible to find links in the transportation network that couldn't possibly be used, even by bicyclists or pedestrians. This language should thus not refer to street "segments" but instead to street "areas." It is eminently practical to seek to shrink the transportation footprint by reducing the amount of street rights-of-way (ROW) that is paved and dedicated to vehicle movement. Portions of the ROW can easily be converted to use by non-auto modes, as greenspace, as bioswales, and/or as community space. This policy should support those sorts of activities, not the removal of potential links in the transportation network, especially those which may already by their nature be more suited to pedestrians and bicycles than other vehicles.

**Repurposing street space.** Encourage repurposing street segments *areas* that are not critical for transportation connectivity to other community purposes.

- **Policy 9.21 Bicycle transportation:** The City of Portland is aiming too low with this policy. If the City truly seeks to gain bicycle mode share deep into the double-digits, it should seek to make bicycling more attractive than driving for most trips of approximately *five* miles or less. This radius allows most of inner Portland to find trips to and from downtown to be more attractive trips by bicycle than by auto. This doesn't seem to be a difficult standard to achieve, as long as the City is willing to make the choices required to devote the necessary portions of the ROW to bicycles, especially on the main arterials that connect downtown to the neighborhoods, and within downtown.
  - **Bicycle transportation.** Create conditions that make bicycling more attractive than driving for most trips of approximately ~~three~~ *five* miles or less.
- **Policy 9.28 Prosperity and growth:** This policy talks about expanding transit service and streetcar service in Civic Corridors with the highest intensity of potential employment and household growth. Since there is significant overlay of Civic Corridors with Major and Priority Truck Streets there should also be language in support of supporting goods movement and as a way of supporting traded sector growth.
- **Policy 9.32 Multimodal system and hub:** While it is important for Portland to maintain its role as a multimodal freight hub, the technologies currently involved are some of the dirtiest sources of air pollution in the entire region, and their pollution plume extends deep into adjacent residential neighborhoods. The City, at the very least as a matter of risk

management, should therefore seek to enforce a zero emission goal on the multimodal freight hub portions of the economy. This could involve electrifying the entire regional freight rail network, transitioning trucks to hybrid biodiesel/electric vehicles, and other technological paths that could not only lead to reduced emissions but also reduced operating costs and additional jobs in the local green economy.

- **Multimodal system and hub.** Maintain Portland's role as a multimodal hub for global and regional movement of goods. Enhance Portland's network of multimodal freight corridors. *Seek ways to achieve zero emissions from freight movement.*
- **Policy 9.35 Freight rail network:** While growing and modernizing the regional freight rail network is certainly a laudable goal, the City should be more specific about the sought improvements: electrify the system, and create additional capacity to allow freight to peacefully co-operate with passenger rail expansion on the same corridors. Other goals may include seeking to move some freight rail yard operations away from the river, where they may no longer represent the best and highest use of those lands (as has already happened at the north end of the Pearl District.)
  - **Freight rail network.** Coordinate with stakeholders and regional partners to support continued reinvestment in, and modernization of, the freight rail network, *including electrification and double-tracking to accommodate passenger rail growth where feasible.*
- **Policy 9.37 Portland International Airport:** The air pollution plume from Portland International Airport currently extends deep into the residential neighborhoods of NE Portland, in a manner that is unacceptable for the long-term health of residents. The City should thus seek a long-term goal of zero emissions from the Portland Airport, and work with partners there to achieve that goal. Future technological advances, including hydrogen fueled aircraft, could allow this to become a reality within the life of the Comprehensive Plan.
  - Maintain the Portland International Airport as an important regional, national, and international transportation hub serving the bi-state economy. *Seek ways to reduce airport air pollution emissions.*
  - Support the growth of ~~Maintain~~ the Portland International Airport as an important regional, national, and international transportation hub serving the bi-state economy. The language should be stronger given the importance of PDX to the economy of the city and state. Additionally the plan should better integrate Airport Futures and include policies about honoring the intergovernmental agreements between the City and Port that came out of Airport Futures.



- **Policy 9.39 Automobile transportation:** Unsure what the measure of mobility will be at this time. Would like to monitor what method of multi-modal transportation modeling the city uses.
- **Policy 9.46 Performance measures:** It is unclear what the performance measures will be. In some areas of the City such as the Columbia Corridor automobile level of service should be the measure for mobility.

I understand that the multimodal performance measures are yet to be developed. This is important. How will they be applied to institutions and other conditional uses and master plans?

- **Policy 9.47 Regional congestion management.** This is a tricky topic that might include on and off-street parking pricing. It would be helpful to identify potential strategies and what triggers might lead to their implementation. The City could take more of a lead here, since what works in Portland might not work in Hillsboro.
- **Parking Management (GP 9-13):** Need to be careful of unintended consequences. E.g. airport models developed for PDX and elsewhere show that constrained parking results in more drop-off trips, which doubles VMT. No mode shift involved. This could apply to other areas of the City as well. Evaluation is important.
- **Policy 9.49 Central City and centers parking:** Currently, parking is managed (or not) very differently across the city. All business districts should have a parking management plan. Currently, loading and unloading in the right-of-way is very poorly managed with much double-parking (without penalties).
- **Policy 9.50 On-street parking:** While the policy language is good, in practice, allowing street seats in business districts that have limited and very valuable on-street parking may not be the most economic use of the right-of-way. Street seats should be removed from the right-of-way when not in use at a minimum and may not be appropriate at all in some areas.

How does the management of on-street parking relate to the transportation hierarchy above? In practice, storage of cars in the public ROW often trumps all other roadway users.

- **Policy 9.51 Off-street parking:** covers the private parking side of the equation. The policies should cover how the hierarchy, on-street, off-street, and city parking standards will be coordinated to achieve the desired outcomes – including the accommodation of active transportation.

This is appropriate policy language, but how will transportation demand management be brought into play (see comment above)? How will development be required to participate in TDM?

- **Policy 9.52 Shared space and resources:** In order for the City to meet some of the goals mentioned elsewhere in this document, real estate that is currently dedicated to vehicle storage will need to find a higher and better use in the future, no matter where it is located – on street or off street. This policy should clarify that it applies to both situations.
  - **Share space and resources.** Encourage the shared use of parking and vehicles to maximize the efficient use of limited urban space, *both on and off street*.

- **Policy 9.53 Bicycle parking:** The bicycle parking requirements need to be updated to required adequate space for on-site bicycle storage that is not in residential units and accommodates larger bicycles, bicycle trailers, etc.
- **Policy 9.54 Coordination:** covers intergovernmental coordination to plan for and provide transportation facilities. Related to my comments on Policy 8.7 above, there needs to be much better inter-bureau coordination and cooperation to avoid outcomes like the Terwilliger and Barbur examples.

#### **Chapter 10: Administration and Implementation**

- **Policy 10.5 (20) Institutional Campus:** This land use designation should be put on hold pending the outcome of the Institutional Zone process. There is no consensus at this time that new institutional zones are an appropriate approach to big institutions.

#### **Comments Specific to Transportation Hierarchy**

1. "Complete Networks" is a more holistic approach and reflects Portland's balanced transportation needs better than a "Complete Streets" approach.
2. There are better ways to evaluate and justify transportation project selection than a mode hierarchy oriented approach.

**The Problem:** As some people said, it would be difficult justify a mode hierarchy that puts the majority of travelers at the bottom (Single-Occupancy Vehicles), even if it is just for illustrative purposes. A complete networks approach begins to balance different modes across the network in an equitable manner, acknowledging different needs in different areas. This does not go far enough, however.

A complete networks framework still places *travel* as the end goal, by prioritizing mobility as the highest purpose for a transportation network. Travel is not a goal; it is a means to the real goal: a destination. For example, a pedestrian-dominant development in East Portland does little to connect a worker to their job downtown because no one is going to walk that far. The worker needs better access to opportunity, not a better sidewalk. Therefore, a transportation network is dependent on the land use around it.

**A Possible Solution:** An *accessibility* framework might be better. Accessibility in planning refers access to **opportunity**, or destinations, and how land use and transportation networks support this. Rather than mobility as the prime mover, accessibility is a function of mobility *and* proximity.

For example, the worker in East Portland needs either greater mobility (speed), greater proximity to destinations (density), or some combination of the two in order to reach his/her destination. In East Portland, where development is fairly low-density, greater mobility is key to get people where they need

to go, which means SOV's or park-and-ride stations near transit are a higher priority. In Northwest Portland, conversely, dense mixed-use development means one can walk to destinations and therefore does not need the same transportation infrastructure as the East Portland area.

**Summary:** An Accessibility-framework places travel as derived demand rather than the end goal. It connects transportation and land use decision-making as parts of the same planning process. Most importantly, accessibility provides sound justification for a balanced transportation network by reflecting land use realities rather than mode-priorities

What specifically is meant by the discussion prompt: "not all modes need to be accommodated everywhere".

- What types of streets / locations would you not need to accommodate people walking or biking?
  - o Our regional policy is clear that all modes need to be accommodated / be usable all streets (except for certain freeways – where a parallel path often provides the bike/ped accommodation)
    - This is our RTP policy language (p.2-31 of RTP: *"Build a well-connected network of complete streets that prioritize pedestrian and bicycle access."* Here is our definition of complete streets in the RTP: *"Complete streets is a transportation policy and design approach for roadways that are planned, designed, operated, and maintained to enable safe, convenient and comfortable travel and access for users of all ages and abilities regardless of their mode of transportation. Complete Streets allow for safe travel by those walking, bicycling, driving automobiles, riding public transportation, or delivering goods."*
  - o During project design, a local jurisdiction pays attention to context – volume of existing & potential users of various modes when making decisions about how to allocate the available right-of-way
  - o Compared to the past, much more sophisticated designs are now being employed in the U.S and beyond that can make streets work for several different modes of transportation.
- We don't want to see a local policy that says that some streets don't need to allow certain modes.
  - o That could be a step backwards from objectives encouraging safe and viable options for people not in vehicles.
  - o There may be certain streets that are a very high freight priority where freight movement takes precedence, but that doesn't mean you shouldn't allow for biking or walking on these streets via a sidepath or other appropriate facility – and strive to make it as safe and comfortable for all modes.
  - o Certain streets may not provide dedicated space for each mode, but instead accommodate all modes by sharing space between modes in a manner consistent with best practices including safety and operational considerations.

- Looking at the “Move DC” Network example that is being used, where streets have modal priorities, the outcome for bicycle is a network with some very major gaps (there are stubs/dead ends in these routes – the network is not connected), whereas the freight network is well connected. I’m assuming that pedestrian is a priority on all of these streets since it is not included in the hierarchy?
  - o Concern with changing “complete streets” approach to “complete networks” – This should not be an either/or choice. IT is important to have complete streets AND complete networks. Moving away from the complete streets approach could make it that much more challenging to improve walking and bicycling in the region. It could presume a lack of reasonable accommodation on commercial main streets – locations where it is particularly important to consider all modes of access. It seems to create a presumption of moving bicycles to a parallel facility without full consideration of options for accommodation. We know that each case will be unique, and don’t want to start with the attitude that we’ll likely need to shift bikes to a parallel facility.
  - o This approach will likely result in the bicycle network being less direct and providing less access to common destinations. This could potentially limit bicycle mode split – one of the goals of comp plan is to shift to non-sov modes including bikes.
  - o Direct access to commercial main streets is import strategy of Portland’s Bicycle Plan and RTP(“RTP bike policy 2: Build an interconnected regional network of bicycle routes and districts integrated with transit and nature that prioritizes seamless, safe, convenient and comfortable access to urban centers and essential daily needs, including school and jobs, for all ages and abilities.”)

### Resilience to Natural Disasters

The plan makes several references related to increasing our resilience to natural disasters. However, it doesn't seem to fully appreciate the extent to which energy supplies could be disrupted - potentially for extended periods. There should be greater recognition about the value of bicycling and walking in the wake of a natural disaster.

### List of Significant Projects

Citizens are directed to the Map App to make comments regarding the TSP and the project improvements. I find the transportation projects list in Map App to be **completely deficient** in multiple ways:

- **Relationship between lists in the Comprehensive Plan and Map App.** The project list (without a map) in the Comprehensive Plan does not coincide with those shown on the Map App. The city needs to produce **one consolidated list and map(s)** for people to comment on and not give them materials, which are difficult to read, comprehend, and reconcile.
- **Old projects don't necessarily support the new plan.** After adopting the Portland Plan and creating a totally updated Comprehensive Plan, why would we simply dust off the old project list (many, I suppose over 20 years old) as a place to start? How will a fundamentally old project list move us in the new directions articulated in the Portland Plan and Comprehensive Plan?

- **No apparent strategy.** The organization makes the list (at least) appear to be a grab bag of projects leading me to the question – Even if we complete the list, will these investments do the best possible job of supporting the outcomes described in the plan? Will we have a first-rate and functional active transportation network that appeals to people of all ages and abilities? A paper/pdf map would help a bunch. The Map App is cool, but it's time consuming to have to click on each line/dot on the map to know what it is.
- **Most new projects are missing.** Projects from recent planning efforts are not included, and the method for adding them to the list should be clarified. The *Portland Bicycle Plan for 2030* projects are largely excluded in SW Portland and probably other areas of the city as well. The *Central City Plan* prominently features the "Green Loop" as one of the big ideas, but it's not shown. How do projects such as this get onto the list?
- **Many project descriptions are vague and meaningless.** For example, Project 90016 Inner Barbur Multimodal Improvements, includes Barbur from I-405 to Terwilliger. It is a \$4,000,000 project, with a timeline TBD to "design and implement transit, bicycle, and pedestrian improvements." Once completed, how would this portion of Barbur be different? How would we know when it's finished?
- **Cost estimates are often highly suspect and generally too low.** Example: Project 90063 Sunset Boulevard from Dosch to Capitol Hwy. (LP-37) has a \$1.7 million estimate to provide bicycle facilities, sidewalks, and crossing improvements for about 1 mile of roadway. The first phase of this was recently completed for about 3 blocks in Hillsdale for \$800,000. How can the remaining mile be done with a theoretical remaining budget of \$900,000? A big concern is how will projects be fairly evaluated and prioritized when cost estimates may be off by a factor of 10.
- **Some projects make no sense.** Looking at pedestrian and bicycle projects in SW Portland, we typically have expensive, and sometimes unnecessary projects listed. In today's funding climate these projects generally will have no realistic chance of being funded. At the same time, the more affordable and functionally valuable projects, are nowhere to be found. Example: Project 90001 Montgomery to Vista Bikeway is described to "design and implement bicycle facilities" for \$4.5 million. This windy route on several very steep residential streets makes no sense for this level of investment. At the same time, SW Montgomery, which is used by the majority of cyclists and pedestrians today, is not listed. With a few safety improvements and wayfinding provided for a small fraction of \$4.5 million, this street could provide a functional and more direct walking and bicycling connection between downtown, Council Crest, and other SW destinations.

### Public Involvement

- **Role of TEG in Public Involvement:** The TEG received periodic reports on outreach on public outreach for the TSP such as mention of what groups might be contacted, etc. and voiced concern about the inadequate amount of time for comment on the criteria, the final draft, etc. Although it is ultimately the role of the CIC for the Comprehensive Plan to oversee community involvement, it was never clear how the TSP outreach efforts meshed with the overall engagement strategies, once the joint BPS community meetings and PSC hearings were completed last fall.



- **Lack of PI Plan:** PBOT never seemed to have a comprehensive public involvement plan for the TSP. It always seemed to be a work in progress and at some points it seemed like PBOT wasn't taking advantage of the extensive work BPS had done on the Portland Plan and earlier versions of the Comp Plan and coordinating closely with BPS staff on what groups to contact. (It's confusing enough for people without the PSC hearing date for the TSP not appearing on the BPS Comp Plan timeline.) Some of us tossed out suggestions of groups to contact but it was never clear which of these groups the bureau contacted.
- **Unequal Access:** Given the more comprehensive update of the TSP to be done two (?) years from now, many saw this as a "technical update", more of a clean up, removal of completed or no longer viable projects, etc. As we discussed at the end of one of our TEG meetings, that meant it was more likely that those "in the know" who already understood the system would be able to add things to the list, while others would have less opportunity.
- **Limitations of Recent Presentations:** Although staff attempted to touch many bases in a short time these past few weeks, the presentations were limited in what they could accomplish. Many were shoe horned into already full agendas and staff found themselves trying to explain the TSP, introduce the project list and then ask people to prioritize items they had just seen for the first time. We had a staff member present to SE Uplift who was not totally familiar with the TSP and relied on a power point to orient us and then asked us for our top 5 priorities. At the Venture Portland event held in SE they soon ran out of sample copies of the SE list of projects. These presentations seldom result in real discussions of trade-offs, ways to break up or sequence projects or provide the public a better understanding of the scope/costs of the projects on the list. Some coalitions have the knowledge and person power to carry these discussions further, but not with such a short time frame.
- **Impossible Timeline for Comments:** The final project list with funding status and ranking didn't appear until January 30. Admittedly people were being encouraged to comment on, add or subtract items via Map App, but there was no way to know how projects were ranked by staff until January 30, with the only hearing before the PSC scheduled for February 24th. Staff's need to cancel meetings, delay discussions because they were behind schedule wasn't reflected in a revised timeline for the public. Instead those delays ate up public review time.
- **Lack of Dialogue on Priorities:** Neighborhoods, business associations, other community groups had 3 weeks before the PSC hearing and 6 weeks before the PSC cuts off testimony on 3/13. Most groups only meet monthly and face an array of complicated issues at this time. Many groups were waiting for the list before they attempted to begin any discussion of priorities for their areas. That limited the time for deliberation. Staff was encouraging everyone to send in their top 5 priorities. Individual priorities are very useful, but it is often possible to gain additional insights on rankings if people with varying opinions are able to discuss the merits of projects together.

