

COMPREHENSIVE PLAN AND TSP COMMENTS

TO: Planning and Sustainability Commission
FROM: Keith Liden (4021 SW 36th Place, Portland, OR 97221)
RE: Draft Portland Comprehensive Plan and Transportation System Plan (TSP)
DATE: March 4, 2015

I have been extensively involved in transportation planning and implementation in the city including: Portland Bicycle Advisory Committee (current), TSP Technical Expert Group (current), Comprehensive Plan/TSP - Policy Expert Group, West Quadrant Plan - Stakeholder Advisory Committee, and Portland Bicycle Plan for 2030 - Steering Committee. My comments below are my personal views and do not represent those of the committees upon which I am serving or have served.

My comments cover three general areas:

- **Overall plan policy and approach;**
- **TSP funding assumptions and projects; and**
- **Intra- and inter-bureau coordination and cooperation.**

OVERALL PLAN POLICY AND APPROACH

In general, the goals and policies in the draft Comprehensive Plan and those pertaining to the TSP provide sound guidance for the city. However, there are several elements that I believe need further improvement, refinement, and/or clarification.

Planning “Lag” Time

There is a significant lag time between the adoption of a transportation plan or transportation elements and their “official” adoption as part of the Portland TSP. For example, the *Portland Bike Plan for 2030* was adopted by resolution in early 2010. It will be 5-6 years before it becomes official. This has hindered its implementation especially when considering development review applications where the provisions of the *Portland Bike Plan for 2030* may not be considered.

Recommendation: Streamline the TSP update process so that major planning efforts do not sit on the shelf for years and become outdated before they are adopted as official city policy.

TSP Project Evaluation Criteria

The project evaluation criteria in the draft TSP represent a positive step toward creating a more transparent decision-making and project prioritization process. I applaud this effort. While I believe the city is on the right track, adjustments are needed in several areas:

- **Comparing completely different projects with the same criteria.** Evaluating totally different projects (e.g., comparing a \$42 million rail bridge project with a modest pedestrian/bike project) while using the same criteria is awkward at best.
- **Clarifying how the evaluation criteria fit into the entire project prioritization process.** The PBOT staff has indicated the criteria are intended to guide decision-making, to inform final

decisions about which projects are placed on the “constrained” list, and to help determine how they are prioritized. But it is unclear how political and other considerations will come into play. No matter how fine-tuned and well-calibrated, the project prioritization process will not conclude with all neighborhoods and modal interests being satisfied. The question is when and how should the political process take place? At the beginning, as part of the ranking, or after the criteria rankings are complete? The process to date suggests the latter.

- **Fitting one size to all situations.** Certain types of projects and areas of the city will always score poorly, regardless of the true need. Examples include active transportation projects of smaller neighborhood scale, safe routes to school, and gap filling projects, which are at a disadvantage because they will have few categories to score points (e.g., not on a high crash corridor, lower population density, limited economic benefit, no freight benefit, etc.). This appears to partially explain the relatively small number of active transportation projects shown in the Map App for the west side of the city.
- **Enhancing the existing transportation network.** The analysis is heavily focused on evaluating individual projects using criteria that primarily consider social, economic, and environmental issues. There doesn't appear to be sufficient consideration about the strategic transportation value of individual projects for making our pedestrian/bike/motor vehicle/freight system whole. At least from the public perspective, the evaluation of candidate projects did not include mapped information about the existing network to determine which new projects might best enhance the existing active transportation network. This apparently led to several active transportation projects on the constrained list for SW Portland that do a poor job of connecting with and/or complementing existing facilities.

Recommendation: Clarify the total decision-making and project/program prioritization process to show how and when the criteria will be used along with political and other considerations to select and prioritize transportation projects.

Recommendation: Adjust the criteria from the one-size-fits-all approach to one that is more nuanced to allow different projects and different areas of the city to be competitive for needed transportation improvements or program assistance.

Transportation Hierarchy

I like this concept (Policy 9.6), but appreciate the complexity of implementation. The city needs to further engage the public and the various stakeholders about how this concept should be applied to help guide a variety of transportation facility decisions.

Recommendation: The city should (1) further engage the public and stakeholders regarding how this concept should be applied; and (2) acknowledge how freight and on-street parking (and the city's parking policies generally) should be considered in the context of the hierarchy.

Comprehensive Plan and TSP Policies

As I indicated above, I believe the Comprehensive Plan and TSP-related goals and policies generally provide sound policy guidance for the city. I also appreciate how the staff has clearly tried to address

public comments on the previous draft. I have comments and recommendations regarding several plan provisions.

Policy 3.50 – Connections refers to having a network of city greenways connecting centers, parks, etc. However, Figure 3-5: City Greenways, does not show any in the southwest portion of the city, which seems very odd given the description of the “Western Neighborhoods Pattern Area” (Policies 3.87-3.90).

Recommendation: *City greenways should be considered for SW Portland.*

Chapter 7 – Environment and Watershed Health. I commented previously that the former chapter title “Watershed Health and the Environment” was inappropriate because it strongly implied that watershed issues were the most important, and all other environmental issues (GHG, climate change, air quality, etc.) were secondary. I appreciate the reversed order in the revised title, but I think it continues to imply a bias.

Recommendation: *Simply change the title of the chapter to say “Environment”, “Environmental Quality”, or similar, and avoid any implied bias regarding relative importance of different environmental issues.*

Policy 7.24 – Impervious surfaces calls for minimizing impervious surfaces. This makes perfect sense. However, in the city’s current application of this directive, BES requirements “penalize” impervious surfaces for bike lanes because they are lumped into the same category as motor vehicle lanes or surface parking lots.

Recommendation: *Consistent with the Environment and Watershed Health goals on page GP7-6, the city storm water rules should to be modified to be more lenient and flexible regarding impervious surfaces for bike lanes and similar active transportation facilities because they are essential for meeting other equally important objectives regarding environmental quality and human health.*

Policy 7.32 – Coordinated stormwater management calls for coordinating transportation and stormwater planning in areas like SW Portland. I fully support this policy. In addition to the policy, city bureaus will need to make a concerted effort to change existing practices because this type of coordination is not consistently carried out (more on that later in this memo).

Recommendation: *Amend the policy to say “... to improve water quality, pedestrian and bicyclist safety, and enhance neighborhood livability.”*

Recommendation: *Commit all city bureaus to effectively and efficiently work together to implement all Comprehensive Plan and TSP policies - not just the ones directly related to their core missions.*

Policy 8.7 – Internal coordination indicates city bureaus should coordinate planning and provision of public facilities and services “as appropriate.” I support this policy, and as noted above, the current practice needs to change so it is always consistent with this policy. Internal coordination would appear to be appropriate always – not sometimes as implied by this policy.

Recommendation: Amend the policy to state: “Coordinate planning and maximize the timely and efficient provision of public facilities and services among City agencies, including especially internal service bureaus, as appropriate.”

Policy 8.41 – Coordination calls for coordination regarding public facilities. As noted above, the phrase “as appropriate” seems odd. When would at least some level of coordination not be appropriate?

Recommendation: Amend the policy to say “... and adjacent landowners, ~~as~~ appropriate.”

Policy 8.98 – Leverage public investment pertains to coordination with school districts. Unless I missed it, there should be a similar policy regarding city infrastructure.

Recommendation: Add a new policy (or perhaps an overall goal) in the appropriate section, which states “Leverage public investment. Encourage City infrastructure investments that complement and leverage major capital investments by the City and other agencies.”

TSP FUNDING ASSUMPTIONS AND PROJECTS

The TSP funding assumptions and the development of the “constrained” project list are directly linked. The amount of anticipated future funding should influence the types of projects on the constrained list. When it is reasonable to assume that future funding will be robust, then larger, more expensive projects may be justified. But if the future funding outlook is bleak and/or highly speculative as it is today, less expensive and practical projects should rise as the top priorities.

Funding Assumptions

The “reasonably aggressive” funding scenario, used to create the “constrained” project list, is really **aggressively optimistic**. It assumes that over the next 20 years, the city will maintain today’s funding level (translating to approximately \$800 million over 20 years) plus an additional \$500 million (again over 20 years) for a total of \$1.3 billion. With a dysfunctional U.S. Congress, unsettled state government, the acrimony of the Portland street fee debate, and unfunded maintenance backlog (e.g., Portland Building, parks, and other infrastructure in addition to streets), how do we really think we’ll get 60% more transportation project funding than we have today?

Recommendation: The TSP should assume that only existing funding levels will be available in the future. Given the unfunded costs of simply maintaining public infrastructure and the uncertain political climate, even this assumption will be optimistic. A second tier of priority projects could be included for funding consideration in the “constrained” list once the new funding assumed in the “reasonably aggressive” scenario actually materializes. **This needs to be a plan – not a fantasy!**

Project List Development and Project Prioritization

Perhaps fueled by the rosy assumptions behind the “reasonably aggressive” funding scenario, the candidate project list was created by focusing on the most expensive projects (generally > \$0.5 million)

listed in existing plans. In developing the candidate project list and the “constrained” project list, major projects were equated only with highest cost – not highest benefit. As a result, many critical low cost projects were never considered, except to be dumped into “programmatic” purgatory with little prospect of being funded.

Using bicycle infrastructure as an example, it could draw from three or the proposed programmatic funding pots including the “Bikeway Network Completion” fund (\$24 million), the “Neighborhood Greenways” fund (\$19 million), and probably a portion of the “Safe Routes to School” fund (let’s say 1/3 of the \$78 million) for a total of around \$70 million over 20 years. That would mean hundreds, or perhaps thousands, of small bike improvement projects, no matter how critical, would be competing citywide for about \$3.5 million available annually. This annual figure would be closer to \$2 million if current funding levels don’t increase and all budget categories are reduced proportionately.

Regarding funding assumptions, the city must first answer this question:

- **Do we develop a budget to live within our means, or**
- **Do we rely on an aggressively optimistic funding future that may, and probably won’t, be realized?**

After answering that question, it has a second choice regarding its approach to project priorities:

- **Do we focus on the most expensive projects that will benefit only specific parts of the city, or**
- **Do we focus on the most affordable and cost effective projects that can be more fairly distributed citywide?**

Recommendation: The city should do several things:

- ***Assume no increased funding.*** Base future funding on an assumption that current funding levels will not rise. A second tier of prioritized projects could be included for consideration to the extent additional funding materializes.
- ***Don’t rely on minimal funding to build big projects.*** The danger of focusing on expensive projects without the funding to match is that only a small handful of neighborhoods will benefit from the few projects we can afford, while leaving most city residents with nothing.
- ***Emphasize low-cost projects.*** Virtually all small improvements (generally <\$0.5 million) were never considered for the constrained project list. Rather, they are all piled into the amorphous “programmatic” project list. With probably thousands of projects in this category and annual funding for active transportation of probably less than \$5 million, these projects will languish for decades. The project list should be turned on its head to emphasize small projects (many of which are in the “programmatic” category) and re-scoping expensive projects to focus on strategically valuable improvements that will leverage investments already made.
- ***Don’t throw babies out with the bath water.*** Several large candidate projects in SW Portland, which were rejected, include critical elements that should be high priorities. They should be revisited and re-scoped into smaller and more affordable projects that complete system gaps.
- ***Provide an equitable distribution of active transportation projects throughout the city.*** The “constrained” project list on the Map App shows how active transportation projects are concentrated in the eastern portion of the city, while the west side (including many areas of substantial need) has relatively few.

INTRA- AND INTER-BUREAU COORDINATION AND COOPERATION

PBOT needs to partner with other bureaus to "piggyback" identified and planned pedestrian and bike facility improvements as part of other street-related projects sponsored by BES and Water Bureau. The coordination called for in Policies 7.32 Coordinated stormwater management and 8.7 Internal coordination (noted above) has not occurred with any consistency. The policies are nice, but they will not mean a thing if the city bureaus do not change the way they operate.

Seizing Opportunities

Even with the "reasonably aggressive" funding assumption, there will be nowhere near enough money to go around. This makes it all the more important for the city to take full advantage of opportunities to make incremental improvements. However, this has often not been the case, at least in SW Portland. The city has often failed to leverage construction work in city street rights-of-way to provide critical bicycle improvements. Typically, these opportunities involve work being led by other city bureaus. With constrained budgets only becoming more so, the city must stop blowing great opportunities to make small, but important, bike and pedestrian improvements that can be done at greatly reduced cost when combined with construction projects undertaken in the same area.

The city has not been following the *Portland Bicycle Plan for 2030* in this regard. Part Five: Strategic Implementation Plan, Section 5.12 Implementation Approach has a subsection titled "Being flexible," which states ***"In the past, the Bureau of Transportation has benefited from being flexible and seizing opportunities that arise to develop projects. Flexibility to respond to shifting conditions for implementation is critical for the complete implementation of this the Portland Bicycle Plan for 2030."*** Implementation recommendation 5.1 E. notes the importance to ***"Be opportunistic and partner with others."***

Opportunity Lost - SW Terwilliger and 7th Avenue

A major opportunity was recently lost to fill a long-recognized bike lane gap on Terwilliger Boulevard between Chestnut and 7th. With all of the adopted plans, notice, and conversation with SW Portland representatives in advance of the project start, this coordination failure by the city starkly illustrates the problem, especially when considering the background:

- **2006** – The Portland TSP identifies Terwilliger as a "city bikeway" with bike lanes as the primary design treatment.
- **2010** - The *Portland Bicycle Plan for 2030* designated Terwilliger for "separated in roadway" (bike lane) treatment along its entire length. Terwilliger Gaps (#8291) is in the Appendix A: Action Plan and Project List to eliminate the gaps on Terwilliger including this one.
- **Fall 2012** - SW residents requested copies of the proposed plans to review and comment. PBOT staff indicated the city would try to fill the bike lane gap.
- **December 17, 2012** - PBOT staff gave a presentation to the SWNI Transportation Committee, indicating that potentially the design of the proposed work at Chestnut and 7th could be modified. SW Portland representatives expressed concern about the design and the need to include the missing bike lane section.

- **December 19, 2012** – I submitted design ideas and photos for PBOT consideration. I was told this would be shared with “our engineers” to see if the southbound bike lane could be included. The ideas were apparently rejected or simply ignored.
- **Spring 2014** – Completion of this bike lane gap is identified in the SW Corridor Refinement Phase as an early multi-modal project to support HCT (Project #3093).
- **Summer 2014** – The project concluded without the bike lane between Chestnut and 7th (a distance of approximately 250’) with a *sidewalk design that conflicts the required alignment for the missing southbound bike lane (photo)*.



SW 7th and Terwilliger Intersection Looking North (note sidewalk in the path of future bike lane alignment)

Other Recent Bike Improvement Opportunities Lost and Almost Lost – SW Portland

The SW Terwilliger and 7th project is the latest in an ever expanding list of fumbled opportunities in SW Portland over the past 10 years. Equally frustrating is the extra cost involved in coming out to the same location later to complete work that could have easily been done the first time. Other disappointments are listed in the table.

Date/Location	Project	Outcome
2005/SW 6th Ave. between Sheridan & Broadway/I-405	6 th northbound was widened from 2 to 3 lanes. While the bike lane was retained, the designers didn't consider how creating a 3-lane street approach made the I-405 crossing for cyclists much more difficult.	A partial bike lane was installed on the I-405 bridge, but this was soon compromised as described in the following entry.
2008/SW 6th Ave. pedestrian crossing at Jackson	The pedestrian crossing at Jackson was constructed with total disregard for bicyclists. The "compromise" bike lane was abruptly ended before reaching Jackson forcing cyclists to merge with cars just before the new crosswalk and merge with the 6 th off-ramp.	No attempt has been made thus far by the city to improve this situation. In response to citizen lobbying, PBOT staff has indicated that potential improvements may be considered.
2009/SW Patton Rd. between Hewitt & Dosch	Water Bureau improvements required repaving of Patton between Hewitt and Dosch. Despite a TSP bike route designation, significant bike traffic between Hewitt and Dosch, suitable gravel shoulder being available, and an uphill bike lane immediately south (uphill) of this project, no bike lane improvement was contemplated.	In response to citizen lobbying, a paved shoulder was installed, but not all the way to Hewitt. Better than nothing, but not optimal.
2011/SW Capitol Hill Rd. & SW Capitol Hwy. at Barbur (Safeway & Walgreens)	The city required a 12-foot sidewalks but no bike lanes for these two developments even though the adopted TSP clearly called for bicycle accommodation on Capitol Hill Rd., Capitol Hwy., and Taylors Ferry Rd. This appeared to be driven by BES storm water standards, which "penalize" bike lanes but not sidewalks, and Dolan fears.	The intersections are permanently compromised for bikes. Ironically, Capitol Hill and Capitol Hwy. are identified in the SW Corridor Refinement Phase for early bike and pedestrian improvements to support HCT. Because the <i>Portland Bicycle Plan for 2030</i> is not adopted, it could not be considered.
2013/SW 4th Ave. at Lincoln intersection reconstruction	To accommodate Milwaukie LRT, this intersection, and all of Lincoln were reconstructed. However, PBOT made no bike improvements on SW 4 th to provide a better bicycle connection from the buffered bike lane on Barbur to continue north on 4 th or turn either direction onto the new bike facilities on Lincoln.	This oversight occurred around the same time as the Barbur road diet discussion, but the city apparently didn't see the connection. In response to citizen lobbying, PBOT staff has indicated that potential improvements may be considered.
2013/SW Terwilliger at Capitol Hwy. intersection improvements	The Water Bureau and BES are making facility improvements in the northeast quadrant of this intersection. PBOT will require street reconstruction to accommodate large vehicle/bus turns from westbound Capitol Hwy. to northbound Terwilliger. Filling the northbound bike lane gap on Terwilliger, immediately north of Capitol Hwy. was not planned.	Concerns about this intersection had been brought to PBOT's attention for several years prior. In 2010, PBOT staff indicated that design options were being considered. But in 2013 the city plans still offered no bicycle safety elements. In response to citizen lobbying, the plan has been revised, and a cycle track design will be used to safely accommodate northbound cyclists through this section of Terwilliger.

Effective Utilization of the Programmatic List

The proposed programmatic project list is potentially where projects such as the ones above would be sequestered, assuming they are clearly identified. With annual funding of only \$2 to \$4 million theoretically available, funding for these types of projects will be lean indeed. Much more funding should be allocated to support these small opportunities, which if acted upon, can help the city efficiently reach its goals, be smart with available funding, and demonstrate that it really is “The City that Works.”

Recommendation: Along with emphasizing smaller, cost-effective projects as noted above, the city needs to shift funding from being almost exclusively dedicated to specific projects to a fund intended for completion of small, opportunistic transportation facility improvements that can be efficiently and sensibly tied with other improvement projects.

Recommendation: Bureaus need to work together as directed by policies 7.32 and 8.7 by sharing information about upcoming projects and determining the feasibility of including minor transportation facility improvements as part of the project scope.