



Bureau of Planning and Sustainability

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MEMO

DATE: April 10, 2015

TO: Planning and Sustainability Commission

FROM: Eric Engstrom, Principal Planner

CC: Susan Anderson, BPS Director; Joe Zehnder, Chief Planner; Art Pearce, PBOT Planning Manager; Leah Treat, PBOT Director

SUBJECT: BPS Comments on TSP Project List

General Observations

This memo serves to transmit BPS staff comments on the proposed Transportation System Plan project list, released in January 2015. PBOT staff have reviewed these comments and their preliminary responses are included in this memo, in *italics*. This is intended to facilitate the PSC's continued discussion of the proposed TSP.

BPS staff appreciates the significant work that went into the TSP project list, including a robust process to develop criteria that establishes priorities. Limited resources make it necessary to have clear priorities, and this is a difficult discussion. BPS supports the criteria established by PBOT, which reflect the Portland Plan vision and goals. BPS also generally supports the proposed list, and urges the PSC to recommend it.

Throughout the last year PBOT has been closely coordinating the development of this list with emerging growth strategies and land use plans established through the Comprehensive Plan. Two elements of that coordination should be highlighted:

- The centers and corridors growth strategies were explicitly incorporated into the prioritization criteria. This helps connect investment plans with our growth intentions.
- A number of high priority freight projects were integrated into the project list to specifically support employment land access. This is a critical element of the City's compliance with Goal 9, Economic Development.



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We believe that this draft has benefited from the extensive public comment period, starting in July 2014. This is a much more transparent TSP than we have seen in the past. Although the PSC will certainly hear additional testimony, we want to acknowledge the extensive outreach that has occurred, through the MapApp, letters, emails, and direct discussion in the Transportation Expert Group.

PBOT Staff Response: *Thank you.*

In addition to these general comments, BPS would like to offer the following more specific project-related comments.

Centers Investment Strategy

BPS has reviewed the project list through the lens of the proposed centers and corridors growth strategy. It is important that the proposed projects actually deliver improvements to locations where we are encouraging growth. It is also important to address long-standing disparities. This dual investment strategy is discussed on page I-29 of the Proposed Draft. On that page is a chart that identifies locations that have both high need and high growth. This list includes Gateway, Rosewood, Jade, Lents, and Midway. Below is a summary of how the proposed TSP impacts these locations. In a few instances BPS staff recommend additional projects to better align the TSP with proposed land use. The TSP appears to make very significant investments in both Gateway and Lents, but the investments in Rosewood, Jade and Midway are limited to improvements on the major corridors that pass through them.

- Gateway: The proposed list includes a significant number of projects in Gateway, including streetscape, safer crossings, important bike connections, and Blue Line light rail station rehabilitation.
- Rosewood: The proposed list includes Blue Line station rehabilitation, pedestrian improvements on 148th Ave, and several neighborhood greenway improvements in the vicinity of this center. This center is surrounded by significant area of multifamily zoning. BPS strongly suggests an additional pedestrian improvement project be identified here focused on improving walkability and safe bike access from the surrounding blocks of higher density residential zoning.

PBOT Staff Response: *Project 80033, Eastside MAX Station Pedestrian Improvements, would provide significant ped improvements in an area beyond the immediate station vicinity, consistent with the Eastside MAX Stations Communities Plan (see page 41). (PH)*

- Jade: The proposed list includes projects to further improve pedestrian safety and transit access on 82nd, Division, and Powell. The proposed Seventies neighborhood greenway also serves this center. This center is also served by proposed new high capacity transit along the Powell-Division corridor. This center is surrounded by significant area of multifamily zoning that extends east between 82nd and I-205. In particular the multifamily-zoned area bounded by 82nd, Division, Powell, and I-205

2



would benefit from a more focused effort to improve pedestrian facilities on local streets, and improve safe crossings on surrounding major streets. BPS strongly suggests an additional pedestrian improvement project be identified here focused within and around this block of higher density residential zoning.

PBOT Staff Response: *PBOT is currently forming a couple of grant funding requests for the upcoming grant funding cycle that will bundle improvement projects in the Jade District and East Portland. We will pull from East Portland in Motion, Division-Midway Neighborhood Street Plan and the planning process underway for Powell-Division Transit and Development. (AB)*

- Lents: The proposed list includes a significant number of projects in Lents, including streetscape, safer crossings, and greenways.
- Midway: The proposed list includes projects to further improve pedestrian safety and transit access on 122nd, Division, and Powell. As explained below, there is also a proposal to establish a new frequent service bus line on 122nd. This center is also served by proposed new high capacity transit along the Powell-Division corridor. This center is surrounded by significant area of multifamily zoning. BPS strongly suggests an additional pedestrian improvement project be identified here focused on improving walkability and safe bike access from the surrounding blocks of higher density residential zoning, and serving schools. For instance, PBOT and BES could collaborate to make green street improvements along SE Boise between SE 111th and 128th, to link two City parks, two elementary schools and a middle school - Gilbert Heights Elementary School/Park, Earl Boyles Elementary School/Park, and Ron Russell Middle School.

PBOT Staff Response: *The January 30 draft project list includes “Powellhurst/Gilbert Pedestrian Improvements, project 80016. One of the segments is on SE Boise from 117th to 128th. The segment from 111th to 117th is already built. (PH)*

- Additional planning to improve street connectivity in this center is also recommended.

PBOT Staff Response: *PBOT is conducting additional street and pathway connectivity in this area through the Division-Midway Neighborhood Street Plan. It is nearing completion and will go to City Council for recommended adoption in Spring 2015. This plan will include both improvements to priority connections within existing public right-of-way and new future connections across existing private property. Once the plan is adopted, the recommendations will be added to the TSP. The improvements within existing right-of-way will be added to the TSP Projects List or program areas as deemed appropriate. The new future connections across existing private property will be adopted in the Far Southeast District Master Street Plan located in Chapter 2 of the TSP. See Map 11.11.7. These connections will most likely be created at the time of development. (AB)*



- There are currently no local east west street connections between Division and Powell, and the TSP does not include any projects to improve that situation.

PBOT Staff Response: *In addition to the TSP project 80016, referenced above by Peter, the TSP does include a couple other projects to help improve the situation. Though I agree there is need for more improvements, we will get closer through the comment above and the Current TSP projects:*

- *Project 80014, Mill Park Pedestrian Improvements.*
- *Project 80005, SE 148th Ave.*
- *Project 80016, SE 11th Ave/112th Ave.*
- *A few FUNDED Neighborhood Greenway projects coming soon on 100's, 130s and 150's. (AB)*

Stronger connection of Civic Corridor projects to Vision Zero policy

BPS supports the stronger emphasis on Vision Zero policy in Chapter 9. PBOT's recent Portland Progress report also stresses this, and there are maps showing the location of pedestrian fatalities and serious injuries (page 64). The map clearly shows that several Civic Corridors have significant safety problems - including Sandy, Powell-Foster, 82nd, and Outer Division. Given the prominent position that Civic Corridors play in the growth strategy, BPS recommends elevating the importance of projects serving these streets - in particular the projects below - which appear to be particularly related to the location of pedestrian fatalities and serious injuries. Two of these projects are identified as year 11-20 (Sandy and Outer Division). We recommend moving these two projects to year 1-10 if that is financially feasible.

Years 1-10

- 40013- 82nd Ave Corridor Improvements (\$5,000,000)
- 70021- Foster Road Streetscape Improvements (\$3,857,778)
- 50049 - 122nd Ave Corridor Improvements (\$8,000,000)

Years 11-20

- 40068 - Sandy Blvd Corridor Improvements (\$6,481,860)
- 80009 - Outer Division Corridor Improvements (\$5,710,912)

PBOT Staff Response: *We're in the process of incorporating comments and issuing revised constrained and unconstrained lists. We'll take a closer look at these two to determine if we*



accurately scored them, especially regarding safety, and whether there is capacity to include them on the constrained list in the proposed time bands. (PH)

Columbia River Crossing

The Columbia Crossing (CRC) Project is in the proposed list, embodied within two projects: 30020 (the bridge) and 30033 (light rail extension). The CRC project is also still listed in the recently updated Metro RTP. Based on decisions in the Oregon and Washington legislatures, there does not appear to be a realistic path to construct the project within the planning horizon of this Comprehensive Plan, at least as previously scoped. We expect that this issue will be discussed during the 2018 RTP update. We have concerns about relying on a very questionable assumption that this project will be built within the next decade.

Including this project in our TSP will distort land use decisions, and potentially lead us to faulty conclusions about the kind of land uses that can really be supported on Hayden Island. For example, the neighborhood center land use designation on Hayden Island is predicated on the extension of high capacity transit to the island, and the secondary vehicle access that was planned with the CRC project.

Although the bi-state CRC project as a whole does not currently have a clear path forward, there are some elements of the project that may still be achievable. For this reason, BPS urges you to modify the project list to more clearly identify several sub-elements of the CRC as potential independent or interim projects, in particular:

- High capacity transit extension to Hayden Island, as an interim step to reaching Vancouver.
- Local bridge access from Marine drive to Hayden Island, to address emergency access and safety.

PBOT Staff Response: *P3 staff met to discuss whether we can separate these projects from the larger CRC. We determined that the Marine Drive interchange and local bridge are so intertwined that we do not have the resources to evaluate how to separate them. We agree with your earlier comment that this issue will be revisited in the 2018 RTP. Based on the conversation with PSC officers on April 2, PBOT staff will draft language for PSC consideration directing the City to work with regional partners to propose evaluation of specific CRC sub-projects in preparation for the 2018 RTP. (PH)*

Streetcar and Other Enhanced “Inner Ring” Transit

The proposed project list builds from the adopted Streetcar Concept Plan, and advances discussion of future streetcar expansion beyond the recently completed loop. The proposed “Inner Ring” land use concept emphasizes continued growth in the Central City and inner-most neighborhoods surrounding it. Much of this anticipated growth is occurring on transit corridors radiating from the central city, like Burnside, Sandy Division, Belmont, Powell, Broadway, Macadam, MLK, Interstate, Williams, among others. As such, the proposed land use plan rests in part on the future reliability and capacity of transit service along these

5



corridors. The study of potential expansion of streetcar service and/or some form of enhanced or more-frequent bus service to these corridors will be an important consideration relative to proposed land use plans. In some cases it is not clear that existing levels of transit service can handle the ridership that could be generated from anticipated development.

BPS strongly supports continued three-party (PBOT-Trimet-BPS) coordination on transit service issues impacting high growth corridors surrounding the Central City. We also support inclusion of at least one potential streetcar project and several additional studies in the TSP (116390 - Johns Landing/Macadam extension), and several studies for possible extension to Hollywood, MLK, NW 18th/19th).

That said, we continue to be concerned that the next potential streetcar extension could be west of the Willamette River. This raises equity concerns. BPS recognizes that a variety of stakeholders have interest in a Macadam extension, but we believe the next streetcar extension should provide additional service to the high growth neighborhoods east of the river. A Macadam extension would be a much stronger project if it were paired with an equivalent east side extension - such as an MLK extension or a NE Sandy extension to Hollywood. Both of these east-side corridors have much more intensive land use designations and more growth potential than Macadam, enabling the streetcar to serve more people.

PBOT Staff Response: *We agree with the PSI letter supporting the Johns Landing project and calling for study of potential extensions. PBOT, BPS, and TriMet are proposing an “Enhanced Transit Corridors Plan” to determine where and how to address transit and other infrastructure and operational needs in high growth corridors, including MLK, including which are appropriate transit technologies for each corridor. (PH)*

East Portland Transit Service.

An important theme in the proposed comprehensive plan has been addressing inequity impacting east Portland. Throughout this process BPS and PBOT have been working with Trimet to identify improvements to transit service in East Portland. These gaps were noted in the Growth Scenario Report reviewed by the PSC in 2013. Through Trimet’s Service Enhancement Planning, several potential new north-south frequent service lines have been identified in East Portland, including an upgrade to service on 122nd. BPS strongly supports these changes in service and believes the TSP could do more to explicitly acknowledge/propose them. At minimum, TSP project descriptions for pedestrian and transit stop improvement projects on impacted streets could be updated to acknowledge the intent that they are being done in support of enhanced transit service. The TSP is oriented toward capital improvements rather than service, but the final plan should have more explicit references to the operational changes that we expect to accompany these improvements. The TSP should reflect the intent that significant transit investments occur in East Portland comparable to investments in the inner neighborhoods.

PBOT Staff Response: *We intend to include narrative language addressing the important interrelationship between transit access, transit service, land use designations, and policies, especially TDM and parking. (PH)*



Freight Projects

A central land use dilemma in the Comprehensive Plan has been the lack of employment land supply relative to forecast demand. State Goal 9 (Economic Development) requires the city to provide an adequate supply of employment land relative to forecast demand. This issue is outlined in detail in the recently updated Economic Opportunities Analyses (EOA). The City's ability to annex or re-zone more employment land is very limited. As a result, we are reliant on other strategies to increase the efficiency of existing land use - that is, grow more jobs on our existing land base. A significant share of potentially available employment land is constrained by a variety of factors, including environmental contamination (brownfields) or lack of adequate infrastructure. Cleaning up brownfields and addressing these infrastructure gaps is a critical element of the City's compliance with state land use Goal 9.

There are a number of specific transportation projects that will also help us make more vacant employment land available for jobs. In particular, the following TSP projects relate specifically to providing better access to vacant or underutilized employment opportunity sites:

- 116540 - Time Oil Road reconstruction (\$9,000,000)
- 116590 - Rivergate Blvd. Grade Separation (\$14,200,00)
- 113070 - T6 Shuttle Road entrance (\$3,000,000)
- 40006 - Marine Drive and 33rd intersection (\$500,000)
- 40100 - NE 33rd Ave Bridge and Ramp replacement (\$14,214,459)
- 40074 - SW Quad Access (\$5,917,500)
- 112090 - T4 Modernization (\$14,906,000)

BPS would also like to express support for a variety of rail-related projects including bridges, double-tracking, overcrossings, junctions are included in the TSP (30039, 30055, 30063, 30065, 30066, 30069, 30076, 30077, 40001, 40085, 113090, 113570, 116510, 116530). Of particular importance is a series of track and overcrossing improvements along the Kenton line in the Columbia Corridor. Collectively these projects create more efficient grade-separated freight train movement and storage in North Portland, which overall supports efficient movement of goods in and out of Portland and improves utilization of existing industrial land. Modernization and efficiency of Portland's rail freight infrastructure also relates to Portland's Climate Action Plan goals, and helps us reduce diesel emissions. These projects are scattered throughout the TSP project lists, with some being constrained and some not. BPS urges a more complete inventory of the rail projects related to the Kenton line corridor, to identify a more logical prioritization and phasing of these related projects. Not all of the needed overcrossings are currently listed, which may limit the effectiveness of the other projects that are being proposed. PBOT Staff Response: Policy, Planning, and Projects staff met April 1 to discuss industrial lands access projects, Kenton line double-tracking, and Columbia Boulevard intersection and width projects. While we agree with the need for industrial lands access, PBOT staff do not believe the rail-related projects listed above have been adequately evaluated. According to Dan Layden, several of the projects listed by BPS staff may not be physically and financially feasible. Several of the projects are little more



than lines on a map, without traffic analysis showing need, without evaluation of right-of-way adequacy, and without a substantive cost estimate.

PBOT staff is proposing to include in the TSP Refinement Plans and Studies list a Columbia Corridor Access Study to evaluate traffic impacts of a proposed UPRR Kenton line double-traffic, of industrial lands access needs (employee and product) , and of potential Columbia Boulevard mobility and crossing improvements. (PH)

In addition to these, several important employment-related projects were left off the constrained list. We are concerned that the TSP as drafted does not yet fully align with the economic development strategies described in the EOA, and we urge you to add these projects to the constrained or other agency lists:

- Several missing Kenton line overcrossings as noted above
- NW Balboa overcrossing
- Willamette River channel deepening

PBOT Staff Response: *Regarding Willamette River channel deepening, please provide project information in the format used for the January 30 project recommendations (project name, project description, cost estimate, etc.). Regarding the other two, we've discussed including an industrial lands access study in the TSP. (PH)*

West Hayden Island

In previous comments BPS staff asked that West Hayden island related projects be removed from the project list because the City is no longer supporting marine terminal development of that site within the 20-year planning horizon. There appear to be several WHI-related projects still in the project list. Please remove these projects as they are in conflict with proposed land use designations:

- 30019 - West Hayden island Rail Access (\$2,751,900)
- 30062 - West Hayden Island Rail Yard (\$8,714,350)

PBOT Staff Response: *We agree and will propose removal. Port of Portland has requested they be retained. (PH)*

Other Agency Projects

The TSP includes a list of major transportation projects proposed to be led and primarily funded by agencies other than the City of Portland, such as ODOT, the Port of Portland, Multnomah County, or TriMet. The source for most of these projects is the Regional Transportation Plan, adopted in 2014. You describe these projects on page 12 of your staff report. In that description you state that “The City acknowledges the RTP projects on this list without agreeing or disagreeing with them. The City is proposing to initiate a collaborative evaluation of these projects and a discussion of additional projects prior to adoption of the 2018 RTP.” This statement raises significant concern at BPS. From our point of view, we are



crafting a land use plan that must be related to and supportive of the TSP as a whole. Inclusion of a project in the TSP means that the City is in agreement with the project and we are proceeding with our land use plans assuming those projects will happen. Deferral of City evaluation of other agency projects creates a situation where land use plans cannot move forward. In some instances, the deferral of this evaluation creates direct conflicts between the City's land use and transportation plans - such as those pointed out above related to Hayden Island.

A potential resolution of this issue would be to acknowledge that the present TSP update must at least include an evaluation of other agency TSP projects for consistency with local land use plans. In some cases, this will mean that the proposed TSP will identify specific changes to the RTP that the City will seek in 2018. The relationship between local TSPs and regional RTP is iterative.

PBOT Staff Response: *We agree and are comfortable acknowledging the results of BPS's evaluation of the Other Agency projects. What is your timing for this?*

Regarding the transportation evaluation of Other Agency projects, we're proposing collaborative studies with the Port and ODOT in preparation for the 2018 RTP to identify priority projects and potential disagreements. (PH)

