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MEMORANDUM

Date: May 16, 2013

To: Eric Engstrom and Sandra Wood, Bureau of Planning and Sustainability

From: Paul Smith, Transportation Planning Group Manager
Courtney Duke, Senior Transportation Planner
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Subject: Bureau of Transportation Comments on Working Draft Part 1

The following are the Portland Bureau of Transportation comments and suggested changes to the Working Draft, Part 1 of the Portland Comprehensive Plan. These suggested changes apply to all Comprehensive Plan chapters, including *Chapter 7: Transportation*, and the Plan as a whole. PBOT staff expects that, if applied, these amendments will strengthen the Plan, increasing its consistency and the potential for it to reach its goals.

Introduction

The Plan Introduction needs to include references to walking, bicycling and transit, especially in “Connect people and places.” “Connect people and places” needs to mention all motivations for increasing active modes, not just pedestrians.

Chapter 1: Community Involvement

Community involvement is not integrated consistently in the chapters of the Comprehensive Plan. It should be integrated consistently.

Chapter 2: Housing

Policy 2.6.d states: Consider the effect of housing investments on school enrollment and student mobility.

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There should be a similar policy statement regarding transportation investments such as, "Consider the effects of housing and transportation investments on school enrollment and students ability to walk and bike to school."

Chapter 3: Economic Development

Policy 3.30, Transit-oriented development. Change to: "Encourage employment growth in areas accessible to housing and transportation networks for pedestrians, bicycles, and transit."

Chapter 4: Watershed Health and Environment

4.23.d, is a very specific policy related to ecologically sensitive redevelopment along SW Barbur and SW Beaverton Hillsdale Highway. How is this consistent with the vision and proposed infrastructure improvements in the Barbur Concept Plan and Metro's SW Corridor Plan?

4.27, 4.29, Modify to add an emphasis on pedestrian and bicycle routes.

Chapter 5: Urban Design and Development

Modify: Policy 5.15.c., Encourage development and right-of-way design that preserves and incorporates Douglas fir trees and groves, where feasible and sensible.

Civic Corridors

The concept of Civic Corridors emphasizes urban design qualities, rather than growth and it is vague. The concept needs to be articulated in further detail in Chapter 5 and in other chapters of the Plan. Policy that emphasizes urban design is not sufficient considering the purpose of the Comprehensive Plan is to guide the future growth and development of the city. If civic corridors are to be implemented in Portland, the Plan must include policy that demonstrates a clear guiding framework for the function of these corridors within the city, including for growth and mobility. Civic corridor policies need to be included in the Plan to describe how civic corridors serve as a location for increased residential and employment density. Current policy focuses on amenities and design rather than serving the growing demand for housing and transportation.

Existing policies that emphasize the urban design functions of civic corridors, are also vague. These policies emphasize civic corridors as unifying, organizing elements of the city, but do not adequately describe how corridors serve This function. These policies should be expanded and clarified. An urban design example is 'livable environments' which is referenced in 5.24.b, but is not further defined.

There is concern that as currently mapped and described, all civic corridors are the same and treated equally. A process to create different typologies for corridors that reflect land use and transportation improvements would be useful.

Centers

The concept of centers is unclear in the Plan, especially in policy 5.17 "Role of centers." The policy focuses on amenities provided within centers and the urban design components rather than their useful function within the context of land use, housing, transportation, and community development. The Plan needs additional details that articulate how centers serve a role within the land use, housing, transportation, and community development of the city.

The Plan also needs to articulate the purpose of and relationship between centers, and between centers and corridors. Policy 5.17 "Role of centers," in particular needs to articulate why centers are important and how they shape planning outcomes for the City. The description of centers in the policy "Typology of centers" needs to be more specific as to what types of centers will be created. The language in the policies describing centers is unclear and can be edited to provide more clarity regarding the concept. The existing policies about connecting centers to each other and about centers being walkable are useful, but there needs to be emphasis on pedestrian and bicycle access to the centers for these policies to be effective.

Policy 5.C, System of centers. They provide increased access to local services, amenities, transit, pedestrians, bicycles networks, and major infrastructure...

Policy 5.17. c. Role of centers. Move "and quality pedestrian and bicycle networks" to 17.d.

Policy 5.17. d. Foster a safe, comfortable, and attractive environment for pedestrian and people on bicycles for all ages and abilities.

One way to address this is to add the following to all center types (on pages 5-9, 5-13 and 5-17):

- High quality pedestrian and bicycle facilities within the center to accommodate greater volumes of pedestrian and cycling traffic.
- Good pedestrian and bicycle access to centers from adjacent neighborhoods to better facilitate short pedestrian and bicycle trips to the center.

Typology of centers

Level of transit access is the only transportation feature used to define the different types of centers. Broaden the “components” distinguishing different centers beyond level of transit service to include pedestrian and bicycle access (density/connectivity) and level of parking management.

Policy 5.22.e. Neighborhood Centers. These centers “primarily serve adjacent neighborhoods” which translates into shorter trip distances. Shorter distances are outlined by the transportation chapter of the Plan as served by pedestrian and bicycle access. The opportunity to emphasize active transportation in this policy should not be missed, since the distance from home is generally more walkable/bikeable.

The distinction between centers in different pattern areas should be more clearly spelled out. Current policy does not adequately address existing centers that may be more auto oriented. It is unclear if these types of centers are less important and if policies lead us to rework these centers. Or does policy support providing services and infrastructure that will continue to support their current growth patterns? The distinction between centers in different pattern areas should be more clearly spelled out.

Active Transportation

All modes of transportation, especially walking and bicycling, need to be integrated into Chapter 5 (as noted above). Walking and bicycling are to serve as the primary modes for short trips of less than three miles and should be emphasized in Chapter 5. Transit should be emphasized for trips of over three miles. The presence of multimodal transportation should be an integral component of policies addressing civic corridors and centers.

Goal 5.C refers to Portland’s interconnected centers and increased access. Policies within the Plan currently do not reference the multi-modal access for pedestrians, bicycles, and

transit that are necessary for interconnectedness and access from the broader area served by each center.

Greenways

The definition of 'greenway' within Chapter 7 differs from the definition of 'greenway' in Chapter 5. This causes confusion and concern. Greenway policies need to articulate more clearly the difference between greenways that serve a purpose for natural corridors (an emphasis in the plan) and greenways that serve a purpose for bicycle and pedestrian transportation mobility. Metro's regional greenways are corridors that may or may not provide public access. The focus of PBOT's neighborhood greenway program are pedestrian and bicycle improvements on low-traffic streets. The greenway policies in the comprehensive plan should clearly define the relationship to these and provide guidance for implementation.

Greenways are the only place within Chapter 5 in which bicycle transportation is included as a significant component. This is an issue since it is the aim of the City to make bicycling a fundamental pillar of the transportation system which will require a complete, diverse network of bikeways to attract people of all abilities to ride to all types of destinations.

Policy 5.9, Significant Places. To reflect the equity goals of the Portland Plan and the Comprehensive Plan, the discussion of significant places should be more community and context based.

Policy 5.13, Inner Neighborhood. Need to emphasize the important role inner neighborhoods have in active transportation especially bicycling for meeting our mode split goals.

Chapter 6: Facilities

Policy 6.15, Context sensitive infrastructure. This is positive direction related to community context. There should be a stronger emphasis on the five pattern areas.

Policy 6.22 Uses of rights-of-way

There is no explicit policy that suggests the right of way can be used for commercial purposes (street cart vending, sidewalk café, Street Seats). Suggest 'Neighborhood

Vitality or Economic Function'? Example: "Allow for commercial uses of the rights-of-way for the purposes of enhancing a commercial corridor, encouraging street vitality and small business."

Need to emphasize that public right-of-way is first and foremost for public access by people and the transport of goods. Transportation has a higher priority than utilities, storm water, and community uses.

A policy related to permanent uses in the right of way should be explored.

Policy 6.23 and 6.29. Interconnected Network. Edit policy language or add a policy to emphasize the importance of street connectivity for all modes and reference connectivity policy (7.16). This applies to acquiring new rights-of-way, and maintaining existing considerations for vacating right-of-way. Example: "Establish and improve a connected right-of-way system that provides infrastructure services throughout the city across modes in compliance with regional street connectivity policy."

6.22 Policy should reflect functional and functions, not just services.

Policy 6.25 Flexible Design. Edit policy language to include multi-modal access. Allow flexibility in the design and development of rights-of-way to appropriately accommodate local physical and environmental context as well as community needs, as appropriate.

6.44 Green Infrastructure. There needs to be more information as to when and where green infrastructure will be incorporated. The term 'large canopy trees' is too specific for the comprehensive plan. Specific tree types should be addressed based on the context in more detailed area or corridor plans or during design.

6.64 Parks, Improvements. 6.64 b should have discussion about trails and pedestrian and bicycle access to and through parks and natural areas.

Chapter 7: Transportation

Goals

The goals need clarification and there are redundancies. For example Goals 7B and 7D are very similar and could possibly be combined. Definition needs to be added where ideas are unclear. The order of the goals should be considered and possibly reworked, as the order implies level of importance. Goals are very aspirational (even for a 20 year plan) and a number of them we at PBOT know are not attainable in that time period. Should the goals be more realistic?

7.6 Green and active transportation hierarchy

The green and active transportation hierarchy policy, currently ambiguous, needs to be revised to clarify how it is applied to transportation projects. The policy and/or the sub-policies and objectives in the Transportation System Plan need to convey how broadly or specifically the hierarchy will be applied. The policy and sub-policy or objectives need to explain in what locations it will or will not be applied. Currently the green hierarchy is not context specific; it needs to provide clarification as to whether it is context specific. For example, how will the hierarchy apply to pedestrian districts, freight districts, and varied land uses? The policy needs to articulate how conflicts between modes will be resolved at the policy, as well as project level. It also needs to clarify whether the hierarchy is implemented through the mobility corridor concept, and if so, how. The policy needs to address how it will be applied at all levels of transportation improvement, from planning to design and implementation.

The Portland Freight Committee voiced significant concern about whether freight will be addressed effectively if retained within the green hierarchy or removed from it. To consider the overall function of the transportation system and the outcomes for the freight transportation system, we must consider whether freight is retained or removed from the hierarchy policy.

Editing language in the policy will provide more clarity. The phrase “all other considerations being equal” is unclear and needs revision or removal. Sub-policy b is vague and needs rewriting. The policy should be renamed ‘Transportation Hierarchy.’

Civic Corridors

In transportation policy content, in the Comprehensive Plan or the Transportation System Plan (TSP), the development of 2-3 typologies for civic corridors will improve clarity concerning corridor function and will lay out a better framework for corridor function. If civic corridors are addressed in the transportation policy content, the policy

needs to clarify whether civic corridors are single streets, or pairs/trios of parallel networks serving all modes. The policy needs to clarify how PBOT will determine which modes will be accommodated on the primary street.

7.24 Project Prioritization

Project prioritization criteria need to be developed through a stakeholder process, assessed through that process, and incorporated into the 'Project Prioritization' policy. Project prioritization policies need to be applied by the Bureau to project list development and grant applications. 'System Management' and 'Life-Cycle Costs' policies are also project prioritization policies and should be included within the Project Prioritization policy. Equity should be incorporated as a component of the project prioritization policy.

7.7 Transportation Affordability

Affordability should not come at the expense of providing service. Perhaps include links between housing and income-accessible transportation to emphasize this.

7.8, 7.9, 7.10 Pedestrian, Bicycle, and Transit

The modal policies were constructed to be parallel. They need to be revised to be different from one another and to be accurate about trip distances that are appropriate for each mode of transportation.

7.13, 7.30 Freight transportation, including air transportation

The policy could focus on the underlying motivations of the freight transportation system to clarify priorities for access and mobility. It could elevate references to non-truck freight (e.g. air, marine). References to air transportation need to be strengthened to recognize the growing importance of this mode in the global economy.

Chapter 8: Administration and Implementation

The other chapters of the Comprehensive Plan exceed the requirements of the State of Oregon related to land use, yet the implementation chapter does not. This chapter needs to provide a roadmap of how the concepts within other chapters of the Plan are to be implemented by city bureaus, while maintaining consistency with other Plan chapters by exceeding state requirements. This chapter does not specify how the Plan will be

understood and applied by all city bureaus. The Plan will be stronger if a framework for this is outlined in the chapter.

General Comments

Active transportation into all sections of the plan

If the green hierarchy is to be effective in providing for a hierarchy of modes and support city goals, all modes of transportation including walking and bicycling need to be incorporated into all sections of the Plan. Walking and bicycling need to be incorporated as viable modes of transportation to reach all types of destinations, not only as modes to access green spaces and recreational destinations as currently emphasized in Chapter 5.

The Plan, especially the Introduction and Chapter 5: Urban Design and Development, need to support the policies of walking and bicycling for short trips by referencing bicycling and walking in sections of the Plan that reference trips of three miles or less. To meet a variety of City plans and goals, walking and bicycling must be comprehensively integrated throughout the Comprehensive Plan.

Bicycling

Strengthen the presence in the plan of Portland as a world class bicycling city. A goal for the city is to make bicycling a major component of the transportation system by increasing bicycle use to 25% of trips. Portland has achieved growth in bicycle traffic among major U.S. cities, giving us a significant advantage to reduce our reliance on the automobile. To achieve this goal, bicycle infrastructure needs to be emphasized throughout the Comprehensive Plan, in particular in the Introduction, Chapter 5, and Chapter 7. Policies should be amended to include bicycling as well as walking. The plan should be reviewed in areas that reference transit; bicycling should be included in these places for references to overall trips or short trips.

Five Neighborhood Pattern Areas

Chapter 5 does an excellent job of describing and articulating the five different pattern areas. This needs to be further developed and integrated into all of the chapters, including Chapter 7. The pattern areas can be used more effectively to distinguish the development of different types of civic corridors or centers. The Plan should also

include references to the Portland Plan 24 pattern areas. It should include policy that guides how these areas will be implemented.

Equity

Equity is not integrated consistently into the Comprehensive Plan.

Affordability

The current Plan does not emphasize providing city services and amenities in a way that is affordable to city residents. Affordability should be reflected in policy as a priority for infrastructure and city services, facilities, and programs.

Project Prioritization

Chapter 7 is the only Comprehensive Plan chapter that currently includes project prioritization. Public input supports the incorporation of project prioritization policies in each of the chapters of the Plan.

Funding Policy

Chapter 7 is the only Comprehensive Plan chapter that currently includes a funding policy (7.25). A funding policy should be incorporated into other chapters of the plan.