



**PORTLAND FREIGHT COMMITTEE**

April 30, 2013

Susan Anderson, Director  
Portland Bureau of Planning and Sustainability  
1900 SW 4th Ave, Suite 7100,  
Portland, OR 97201

Dear Director Anderson,

On behalf of the Portland Freight Committee we want to thank you for the opportunity to provide our comments on Portland's Draft Comprehensive Plan Update.

The Portland Freight Committee has been advising the Portland City Council on issues relating to freight mobility since 2004. The committee is comprised of over 40 members that include both public and private sector representatives, including those from logistic service providers, shippers, trade associations and various businesses related to multi-modal freight activities (see attached membership roster). We are dedicated to educating and informing policy makers and the public at large about the importance of efficient freight movement within our region.

The Comprehensive Plan provides direction for City decision-making on land use, transportation, parks, sewer and water systems, natural resources and other topics, therefore, an important tool that impacts the region's businesses and residents. The Portland Freight Committee formed a task force to review the Comp Plan and focused our attention on Chapter 7 Transportation. We used the following goals from the Portland Plan to guide our discussion.

- The PFC is committed to integrating traded sector competitiveness into the city's planning and overall policy directions with a focus on export growth.
- The PFC supports prioritizing freight movement over single occupancy vehicle travel on designated truck routes and increasing the freight movement share of our limited transportation capacity.
- The PFC supports the increase use of transit, bikes, walking, carpooling and telecommuting to reduce both wear and demand on the transportation system and to free up capacity for freight mobility.

In addition to our comments, suggested edits and questions included in the attached copy of the Comprehensive Draft Plan, we wanted to specifically highlight a few of the policy concerns we have with the plan.

1. The Draft Comprehensive Plan does not adequately address the City's role as a major west coast gateway for international trade and the importance to our local economy. Portland is the 4th largest freight hub on the west coast due to a combination of geography and transportation infrastructure. The convergence of two navigable river systems with marine access, two interstate highways (I-5 and I-84), two class I railroads (Union Pacific and BNSF) and an international airport assures the City's continued role as a major center for trade and freight distribution. The transportation sector alone employs about 11% of the region's workforce which is the 3rd highest concentration of employment in these industries in the nation, only behind Atlanta and Miami. Consequently, the Portland Freight

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Committee requests the Comprehensive Plan Update include language that acknowledges the major role freight movement and international trade has on our overall economic health and livability.

2. The PFC believes it is essential for Portland's emergency preparedness strategies to be addressed in a specific section in the chapter on transportation. Over dimensional routes are necessary for emergency response vehicles, police, fire, ambulance, tow trucks and other emergency providers to be able to reach their destinations in an efficient and timely manner. Over dimensional routes are also necessary for transporting over-sized equipment (heavy construction equipment, culverts, transit supports, building materials, etc.) A Regional Over Dimensional Truck Route Plan is scheduled for October 2013 and request the results be reviewed and policies added or refined for the Draft Comp Plan.
3. The PFC recommends that freight transportation be removed from the Green and Active Transportation (GAT) hierarchy (Policy 7.6) or rewritten to address the freight needs in the context of existing TSP and land use policy. The TSP defines a street hierarchy for seven classifications (traffic, transit, bicycle, pedestrian, freight, emergency response and street design) based on established land uses. E.g. Priority freight streets serving industrial districts and local service streets serving residential areas and local commercial uses. The use of the Green and Active Transportation hierarchy should be limited to residential districts and not applied to business or industrial districts or along major commercial corridors. In our opinion the GAT hierarchy is contrary to supporting a balanced transportation system that serves the mobility needs for all transportation users while also promoting needed economic prosperity. Significant modes of freight transportation are left out – i.e., rail, barge, trucks and airplanes. Freight is the movement of goods and services; however, it is listed as a specific mode of transportation. The Green and Active Transportation hierarchy concept is also without sufficient context and contrary to the fundamental basis of land use planning principles where the transportation network serves adopted land use categories, not the opposite. Land use defines the area and transportation serves the land use needs. The unintended consequences of the GAT hierarchy may inadvertently impact an area by making current traffic conditions worse and creating conflicts between modes.
4. It is our understanding that the Green and Active Transportation hierarchy policy was taken in part from the "Vancouver, British Columbia's transportation plan for 2040 called "Moving People, Moving Goods (2012)." PFC recommends that the City incorporate the guiding principles of their plan if not in its entirety. The City of Vancouver has clearly defined two plans: Moving People, walking, cycling, transit etc. and Moving Goods, long distance, local goods and services and emergency services. The following paragraph is good example of a how to approach the decision making process when faced with constrained budgets and or interests, because it is unclear in the draft comp plan how the city intends to create a decision making tool:

*"M1.2. Consider impacts to transit, commercial vehicles, and general traffic flow prior to reallocating road space. Although walking and cycling are top priorities for the City, the needs of all road users must also be considered when allocating road space. In particular, transit and truck routes play an essential role in the city, moving thousands of people and enabling goods and services to be delivered in a timely manner. Accordingly, measures to improve conditions for walking and cycling on these routes should include careful assessments to determine potential impacts to transit and goods and service movement. Impacts to general motor vehicle traffic should also be considered, including the potential for drivers to shift to other modes or use alternate routes.*

*Some streets require an additional level of consideration because they serve as important transit and/or truck routes, or because they handled a particularly high volume of motor vehicle traffic on relatively limited space. Many of these streets are identified as part of the Major Road Network (MRN), and are co-managed by the City and TransLink.” (Transportation 2040).”*

5. The PFC promotes a balanced approach to planning where the nature of the street, its connecting land use and current conditions are evaluated before making changes. We suggest an inclusive and transparent process that includes businesses and the freight community along with impacted groups to determine what the best plan is for moving people transit, emergency vehicles, cyclists, pedestrians and disabled and moving goods and services. Based on the city’s priority to maintain and increase jobs perhaps a Triple Bottom Line Analysis should be used where the Environment, Economics, Traded Sector, or General Prosperity, Equity and Safety are assessed for resolving project conflicts.
6. Portland City Council adopted the Freight Master Plan in 2006 which identifies a freight classification network adopted as part of the City Transportation System Plan (TSP) that provides guidance for providing efficient freight movement and prioritizing transportation investments. The PFC believes that creating a *Civic Corridor* classification is in conflict with existing TSP freight street classifications. According to the map on page 6-30 of the Draft Comp Plan, civic corridors are proposed on streets also designated as Priority and Major truck streets and state highways. Creating this classification is contrary to many of the policies that have been proposed; i.e.; Improve and maintain the existing transportation system in order to support a strong and diverse economy and enhance the competitiveness of the city and region in world markets.
  - a. The PFC is concerned how freight mobility needs would be address on Civic Corridors that are also identified as Regional and Priority Truck Streets (e.g., US 30, 99E, I-5, NE 82<sup>nd</sup> Ave north of Columbia Blvd, NE 122<sup>nd</sup> Ave north of Sandy Blvd) and Major Truck Streets (e.g., Sandy Blvd, Powell, Hillsdale Hwy, MLK and Macadam/HWY 43, 122<sup>nd</sup> Ave, 82<sup>nd</sup> Ave).
  - b. Priority and Major Truck Streets are a key City and regional resource and their primary freight function should receive the highest priority because of the lack of alternative routes. The PFC recommends that Regional, Priority and Major Truck Streets have priority over Civic Corridors and that Civic Corridors will not be applied in designated industrial districts.
7. Overall the Draft Comp Plan provides limited direction on connecting transportation to Industrial lands whether it’s for goods movement or access to jobs. Freight mobility throughout the region is critical for Portland’s role as a West Coast trade gateway which the city supports through Greater Portland, Inc. which was formed for the sole purpose of increasing the role of Portland in traded sector exports.

In response to the request to also review Chapter Three of the Draft Comprehensive Plan we encourage the following:

1. Maintaining, protecting and increasing available Industrial land supply. When Industrial lands are purchased and converted to other uses then mitigation steps must be considered for lost business use and job. For instance if West Hayden Island is not annexed then mitigate for the loss of a

marine terminal and potential jobs. Providing efficient and swift access to Industrial areas for both trucks and employees.

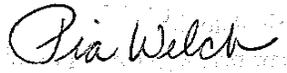
2. There should be protection for Industrial Lands and Business Districts similar to Policy 8.9. In reference to the Administration and Implementation section Policy 8.9 there should be some language concerning evaluation overlays on a case by case basis. At the very least there should be a 8.9e that discusses that overlays need to be done in a way that they do not stifle any necessary development. What is being looked for is a consistent balanced approach.

Thank you in advance for consideration. The Portland Freight Committee would be very interested in collaborating with you in any way we can to work through our policy differences as well as support you in the areas of agreement.

Sincerely,



Debra Dunn  
PFC Chair



Pia Welch  
PFC Vice Chair

Cc: John (Toby) Widmer  
Paul Smith  
Joe Zehnder  
Courtney Duke

## Portland Freight Committee Membership

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BERNIE BOTTOMLY	Portland Business Alliance
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