

Portland Bicycle Advisory Committee

Working to Make Bicycling a Part of Daily Life in Portland

1120 SW 5th Avenue, Room 800
Portland OR 97204



February 17, 2016

Tammy Baney, Chair
Oregon Transportation Commission
355 Capitol Street NE, MS #11
Salem, OR 97301

Dear Chair Baney,

The Portland Bicycle Advisory Committee (BAC) is a City Council-appointed volunteer committee charged with advising the City of Portland and its partners on matters related to bicycling. As a committee dedicated to the safety of bicyclists on all roadways, the BAC appreciates the opportunity to comment on the Oregon Department of Transportation's update of the 1995 Oregon Bicycle and Pedestrian Plan (OBPP).

The updates to this plan will create the policy framework needed to increase bicycle and pedestrian use in the state, which is critical to the state's economic, environmental and community goals. The BAC believes that the current draft of the OBPP lacks the policy directive to develop a bicycle network that will increase bicycle mode splits and save the lives of vulnerable road users throughout the state. The Draft OBPP offers limited specificity, is hard to understand, and is poorly written with vague language. To that end, the BAC recommends the Oregon Transportation Commission (OTC) address the following concerns as they relate to the update.

The plan needs greater specificity about WHO will be implementing it.

The plan does not identify who is responsible for implementing the plan or how the effective implementation of the goals and strategies will be assured.

For example, Strategy 5.2A states: "Develop guidance to understand economic and cultural barriers associated with different demographic groups and communities walking and biking." While it is not productive for every transportation agency to study this, the plan provides no direction on which ones should, for example ODOT, MPOs, or large cities. The Roles and Responsibilities section (p. 72) offers some general guidance, but it still leaves many questions regarding implementation responsibilities. The vague and discretionary language around compliance will most likely lead agencies to ignore the plan's goals and strategies and have no concern over consequences if the OBPP is not followed or considered.

The plan needs concrete recommendations about projects and funding sources.

The plan does not detail any project investment recommendations.

The Next Steps section has a subsection "Defining the Network" (p. 79), which discusses how a biking and walking network might be defined; however, it ignores the work already done by many cities and MPOs in the state. At a minimum, the plan should recognize the major work that has been done to date by regional and local governments, such as the *Metro Regional Active Transportation Plan*, and the *Portland Bicycle Plan for 2030*. The draft plan implies that we are starting from scratch, when in fact, substantial work and financial investments have been made regarding networks and improvement priorities.

The plan should include the bicycle and pedestrian networks in Metro's adopted Regional Active Transportation Plan as part of the network of statewide significance.

The BAC concurs with comments made by the Metro Council, submitted to the OTC, in a letter and addendum dated February 4, 2016 regarding the inclusion of the Regional Active Transportation Plan network in the OBPP.

It is understood that the Draft OBPP calls for defining the network as a key initiative and next step. However, as represented in Metro Council's comments, multiple local governments (cities, counties, and MPOs) have done the intensive work of designating bicycle and pedestrian networks in their jurisdictions. If networks are part of adopted local plans, then it has been demonstrated that they comply with applicable regulations, including state regulations. The BAC recommends that networks in these plans be recognized and reflected in the OBPP. In particular, the BAC supports integration of bicycle and pedestrian networks designated in the Metro 2014 Regional Active Transportation Plan into the OBPP as facilities and networks of statewide significance.

The OBPP needs to address how ODOT will implement the plan on its own facilities.

The OBPP needs to establish clear implementation actions for state highways.

The BAC concurs with the comments made by Metro Council, including recommendations that specific actions and standards be established to guide implementation; that clear, actionable tasks and timelines be presented for implementation on state facilities; that a state system map be included; and that policy direction regarding the role and importance of state highways in a complete bicycle and pedestrian network be carried forward from the 1995 OBPP.

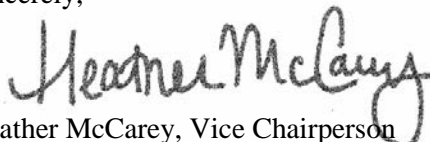
The OBPP needs to support ODOT's adopted Transportation Options Plan.

The OTC adopted ODOT's Transportation Options Plan in April of 2015 to encourage the use of non-vehicular modes. The success of this plan relies on an OBPP that identifies a network of bicycle and pedestrian infrastructure and the funding necessary to implement it. The current draft does not do this.

In addition to the recommendations detailed above, the BAC fully supports and concurs with the comments made by Metro Council in its letter to the OTC dated February 4, 2016.

The BAC appreciates the opportunity to provide comments on the draft OBPP and is grateful for the OTC's efforts to develop a safe bicycle and pedestrian network in Oregon.

Sincerely,



Heather McCarey, Vice Chairperson
Portland Bicycle Advisory Committee

C: Savannah Crawford