

June 23, 2017

Steve Hoyt-McBeth  
Portland Bureau of Transportation

cc:

Commissioner Dan Saltzman, PBOT  
Commissioner Chloe Eudaly, ONI  
Scott Pratt, President, Laurelhurst Neighborhood Association

Dear Sirs and Madame,

As members of the Laurelhurst Neighborhood Association who are monitoring the Campus Institutional Zoning Project and its implementation, and on its behalf, we would like to offer the following comments on the process and content for development of the TDM proposals for City's new Institutional Zones.

**First, there has been an unfortunate breakdown in the neighborhood involvement effort at PBOT.** As the two of us for over two years have been following and have been integrated into the Institutional Zoning Project and all the permutations of its plans for transportation demand management, it was alarming that we were notified of the first stakeholder meeting of 2017 at 1:58 pm on May 30, a mere 24 ½ hours before the meeting. As a consequence, we could not prepare nor could one of us attend. The materials presented at that meeting obviously reflected hours and hours of work over weeks with the other stakeholders in the process. This failure of notice and lack of neighborhood involvement has caused a serious breach of faith in the PBOT process.

**Second, the proposed structure of the “alternative performance targets” nearly sever the nexus of any institutional TDM program from the objectives in the Transportation System Plan.** While we were not present when this draft was developed, the intention of the language seems to have migrated from serving the objectives of the TSP to some other unidentified rationale. Further, at the beginning of this process PBOT itself highlighted all of these objectives (i.e., standardization, traffic and parking reductions, and performance-based evaluations) that now are in danger of being diminished or lost through the current draft language. Consider this PBOT statement from earlier in the process:

- 1) Clarify and standardize performance-based requirements to reduce traffic and automobile parking demand at campuses and institutions, primarily those sites owned and managed by organizations with properties in the proposed Campus Institutional Zones and other large institutions (emphasis added)

We believe that if there is a necessity to provide alternatives to the mode share targets developed per the objectives of the TSP, there must be clear and convincing evidence on how that conclusion has been justified and much more specificity on how the alternates are developed. (See the attached for proposals, high-lighted in yellow, of changes in language of 17.106.020.)

We also have concerns about the “Pre-Approved Plans”, but because information is so sparse on these at the current time, we reserve our comments to a future date.

We now hope there will be improvements in PBOT's stakeholder process that further constructive dialogue between the neighborhoods, PBOT, and the institutions. On behalf of the LNA, we remain,

Sincerely yours,

James Edelson, Secretary, Laurelhurst Neighborhood Association

James Parker, Transportation Chair, Laurelhurst Neighborhood Association