

July 11, 2016

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Dear Sirs and Mesdames,

As members of the Laurelhurst Neighborhood Association who are monitoring the Campus Institutional Zoning Project and its implementation, on its behalf, we would like to offer the following comments on proposed approaches to the implementation of TDM requirements for the new institutional zones.

First, we would like to congratulate PBOT and PBPS on the progress to date. We are heartened that draft documents require both a Traffic Impact Analysis and a Transportation Demand Management Plan as components of a complete rezoning application and when triggered by development. In addition, we previously had been heartened that PBOT proposed to continue effective performance-based criteria in all earlier drafts of a new Title 17.106. Consider the importance of performance-based targets in the TDM that is articulated in the following draft of December 15, 2015:

“In collaboration with the Bureau of Planning and Sustainability’s comprehensive plan implementation projects, this TDM upgrade will:

- 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;
- 2) **Clarify and standardize performance-based requirements** to reduce traffic and auto parking demand from development covered by conditional use permits and master plans;
- 3) **Establish new standards** to reduce traffic and auto parking demand from mixed-use development over certain thresholds, specifically those covered by the proposed Mixed Use Zones project;
- 4) **Establish new standards** to reduce traffic and auto parking demand from development in Central City Plan District mixed use and employment **zones** over certain thresholds.

On the other hand, the current PBOT staff proposal, presented at the July 7 meeting of stakeholders in response to a Stakeholder Proposal presented at the June 7, 2016 meeting of the same group, raises major concerns to us as members of our neighborhood association and as residents of Portland:

1) SHORT-TERM CONCERN - Removal of performance-based requirements

The pending proposal presented by PBOT staff intends to remove the performance-based SOV target metric, and replace it with a “Menu-based Point System.” The SOV target is relegated to one of three “Measures” that receive red, yellow or green coding. As the LNA has made clear in previous communications to the City, it is the real reduction in trips to the medical center that improves safety and quality of life for our residents, not the number of action items that an institution may incorporate in a menu of TDM strategies.

It was expressed at meetings by representatives of certain institutions that they can control endogenous factors (e.g., bus passes) but not exogenous factors (e.g., roadway alignments). We agree with that analysis and that is why we would like to work with the institutions, PBOT and City Council to begin to address that shortcoming of the TDM process (see section 2 below). However, there are a wide range of endogenous factors under institutional control, as well as additional efforts that institutions can currently pursue with regards to exogenous factors to affect key TDM metrics.

The Portland Sustainability Commission in its Sept 15, 2015 communication to City Council clearly stated “The policies in this (Comprehensive) Plan move us further towards multimodal evaluation of system performance.” And, further, Policy 9.5 states “Reduce VMT to achieve targets set in the most current Climate Action Plan and Transportation System Plan, and meet or exceed Metro’s mode share and VMT targets.” The direction of the current PBOT proposal seems to be the antithesis of the pending Comprehensive Plan update.

Thus we believe it is entirely unwarranted for PBOT at this time to undertake a wholesale shift away from performance-based targets to a menu-based point system. The latter appears to be a valuable supplementary requirement, but it cannot serve as a replacement requirement for the former.

2) MEDIUM-TERM - Failure to acknowledge structural deficiencies

As participants in the IZP proceedings, we have come to realize there are legitimate concerns that institutions face because of inadequate City and Tri-Met facilities. We have come to realize that it is the last 100 yards of bike paths on Glisan at the hazardous 47th intersection that thwarts significantly higher bike participation at PPMC. Likewise, the last several hundred yards from the Hollywood Station pedestrian overpass to the west entrance of the PPMC thwarts significantly higher ridership of light rail.

We believe an integral part of TDM plans should be to identify those specific barriers to higher mode split participation, and recommend those items explicitly as projects in need of prioritization at PBOT, through the BAC and other forums, and at Tri-Met. The TDMs may also be able to facilitate a role for the institutions to partner in planning, supporting, and co-funding

priority projects. We believe this is an area ripe for cooperation between neighborhoods, institutions, PBOT, and others.

Thanking you for your attention to these concerns, we are

Sincerely yours,

Tony Nickles, Member-at-Large, Laurelhurst Neighborhood Association

James Edelson, Secretary, Laurelhurst Neighborhood Association

James Parker, Transportation Chair, Laurelhurst Neighborhood Association

CC/ Dick Kuhns, President, Laurelhurst Neighborhood Association

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