



PORTLAND BUSINESS ALLIANCE

Leading the way

February 3, 2010

Mayor Sam Adams
City of Portland
1221 SW 4th Ave., Suite 340
Portland, Oregon 97204

Dear Mayor Adams,

The Portland Business Alliance, a coalition of 1,400 small, medium and large businesses, would like to take this opportunity to forward our comments regarding the proposed Portland Bicycle Plan. The Alliance is supportive of the overall goal of promoting and investing in alternative modes to reduce the need for system capacity expansion, reduce carbon emissions and make Portland a more healthy and attractive community. We are generally supportive of the plans call for additional facilities that separate bike travel from freight and auto use such as bike trails and bike boulevards.

However, we have concerns about some of the plan's specific elements. We would like to make suggestions that, we believe, would support not only the objectives of the Portland Bicycle Plan but also the city's broader multi-modal transportation and economic development strategies.

We detail our concerns below, but briefly, they are:

- The plan's ambition regarding achievable bicycle mode split may be unrealistically high. The plan references Amsterdam and Copenhagen as cities to emulate in mode share, system design, etc. But these cities' tax structures, economies, and physical landscapes greatly differ from those of Portland. This difference should be accounted for when defining plan goals.
- At times, the plan appears to call for prioritizing investment in pedestrian and bicycles over other modes and uses, potentially undermining the city's successful multi-modal strategy.
- The plan's call for creating a bike district in downtown raises questions regarding the multi-modal transportation needs of the central city in its role

as a regional economic center. Many trips coming into the central city are regional in nature, primarily through transit, auto and truck modes. The economic strength of the central city depends on all modes having easy access and circulation, including autos and trucks.

- The plan should contain performance measures for investments in bike facilities to determine whether they achieve the objectives set out to secure funding approval.
- Oregon's long-standing user-pay philosophy should extend to bicycling if it is going to be a significant user of the right-of-way and impetus for significant capital expenditures.
- The already-adopted transportation plans, such as the Central City Transportation Master Plan and the Freight Master Plan, should not take a back seat to the Bicycle Master Plan. Clarity is needed as to how conflicts between the plans will be dealt with and which plan will trump if no win-win solution can be found. We understand that these plans and others will be considered within the Transportation System Plan update, and we look forward to being a part of that effort.

Detailed Comments

Hierarchy of Modes. Portland is one of the world's success stories when it comes to transportation planning. One of the keys to our success is that we have been truly multi-modal in our thinking. We support balancing the role of each mode in meeting the city's mobility and access needs. Therefore, we are concerned about the plan's Green Transportation Hierarchy, which we read to call for prioritizing investment in pedestrian and bicycle infrastructure over transit and commercial auto needs. While the Alliance agrees that investing in alternative modes to auto is critical to reducing congestion and maintaining capacity, the plan cannot undermine the need to maintain the infrastructure that supports freight and commercial vehicles. Their mobility is essential to the local, regional and state economy. Even if the plan's ambitious goals regarding mode split are achieved, auto travel will still represent the vast bulk of trips, and the city and the region's economic vitality and livability depend on maintaining an efficient auto-travel system. We urge that investments made in pedestrian and bicycling modes will be considered in coordination with other modes with the intention of improving the overall

operation of the transportation system, and we encourage added language making that clear.

Central City. While we agree with the plan that the central city provides a unique opportunity for improved bicycle access, we are concerned that the implications of being designated as a “bicycle district” are not clear. The central city is a regional economic, cultural and civic center. The central city land use pattern supports a high density of mixed uses, and its transportation infrastructure supports access to that variety and concentration of uses. Therefore, any recommendations made to increase bicycle facilities in the central city must be considered within the context of regional land use and density strategies and the unique, right of way limited nature of downtown. Specifically, the plan’s goal of making trips of three miles or less more attractive should not be implemented in a way that makes regional auto-based access less attractive. Instead, designation of bicycle lanes, boulevards and tracks should be made in areas that make sense for the central city resident, the businesses, the cyclist as well as the regional customer. We look forward to working with you and central city property owners on achieving this balance.

Another consideration of the mixed use, dense central city that the plan should more carefully consider is the high cost of mixed use, high-density development. Seismic codes, materials cost, system development charges and achievable rents make central city development riskier and more costly than low density, greenfield development. Therefore, the Alliance is concerned with any requirements that add on extra development costs or time to an already regulatory-heavy development environment. Again, if we want to support regional land use and employment goals, we need to facilitate that development to occur within the central city, not impede it. We are not supportive of the plan’s recommendation to require additional bicycle facilities within buildings, i.e. changing facilities, bicycle parking, etc. Instead, the Alliance recommends expanding bicycle facilities through a zoning incentive approach within the Portland Plan and the Central City Plan Update.

Performance Evaluation. The Alliance would like to suggest that there be a performance evaluation process for bike facilities that results in the reduction of auto parking or travel lanes. While some bike corrals are well used, others are not and could be converted back to auto parking spaces without significantly reducing

the availability of bicycle parking. Similarly, travel lanes that are removed to accommodate bikes should revert to auto use if they are not experiencing the anticipated increase in bicycle use after a reasonable period of time.

Licensing, Education & Funding. The Alliance believes that one of the significant issues impacting the safety of bicycling and its wider acceptance as a legitimate alternative mode is bicyclists who do not know - or choose not to obey - traffic rules. The Alliance suggests that bicyclists be required to demonstrate knowledge of the traffic laws just as other direct users of the right of way must do. Also, if this city is serious about significantly increasing bicycle mode share, it is unavoidable that bicycles be asked to share some of the burden of paying for the infrastructure they use. While their per-unit burden on the system is low relative to other modes, it is not zero – particularly when significantly expanded facilities are being constructed, or parking stalls are removed and their associated city revenue are foregone. The plan should acknowledge that bicycling would need to contribute to the funding of the system in some fashion. We ask that you extend the user-pay philosophy to bicycling.

Industrial Areas. The Alliance is concerned about the emphasis in the plan on improving bicycling facilities in industrial areas, which may attract riders to areas where there are inherent conflicts that cannot be mitigated except at considerable expense. Where alternatives exist, the Alliance recommends against designating major city bikeways in industrial areas and Freight Districts. While these areas may be appropriate for experienced riders and commuters, recreational riders and families may not be proficient at navigating the many railroad crossings and truck traffic. Attracting less experienced riders to these areas could reduce safety rather than enhance it.

Waterfront Areas. We understand that the Portland Bicycle Plan staff coordinated efforts with River Plan staff to align the proposed bicycle path map and the current status of conversations between the city and harbor businesses regarding trails through active marine industrial sites. However, we believe it does not make sense to require bike paths into and through active marine industrial areas. We look forward to the Transportation System Plan update to resolve these potential conflicts.

Street Lighting. We are pleased that the plan calls for improved street lighting at intersections and other high traffic areas. The Alliance believes that improved lighting would provide significant safety enhancements at key intersections where bike-vehicle interactions are difficult.

Freight Master Plan. The Alliance appreciates that concerns about potential conflicts between the Portland Bike Plan and the Freight Master Plan are mentioned, but we would like to see greater attention paid in the plan here and elsewhere to the opportunities for the plan to facilitate separation of bike and freight movement to provide more of the stress-free cycling that the plan identifies as a key ingredient to success.

There appear to be a number of areas where the recommendations of the Portland Bicycle Plan may conflict with the policy of the adopted Freight Master Plan. We would support language in the plan that details how these conflicts will be resolved if the plan is adopted.

- We would suggest the adoption of implementation strategies that encourage bicycle use without reducing freight mobility by focusing on the development of parallel facilities such as bike boulevards and separate pathways. In our view, bike facilities should not be placed on Priority Freight Streets if doing so will reduce lanes or freight capacity, increase congestion or result in lane widths below 12 feet.
- For Major Truck Streets we would again emphasize parallel facilities and maintenance of 12-foot lane widths; however, we recognize that there may be cases where no parallel facility exists. In these cases the Alliance believes great care must be used in integrating bicycle facilities on Major Truck Streets so as not to diminish the freight capacity or travel time of these important corridors. We would suggest that the city adopt a hierarchy in facilitating bicycle movement on Major Truck Streets that looks first to re-striping to accommodate bike lanes without removing travel lanes or reducing existing lanes to a width of less than 12 feet. Second, after consultation with local businesses, consider removing parking to

accommodate a bicycle lane. Finally, as a last resort, remove travel lanes if it can be demonstrated that freight travel time in the corridor will not be degraded. Lane removal would be preferable in these cases to reducing travel lane width below 12 feet. Narrower lanes provide the illusion of capacity on the route but are not safe for freight vehicles and create conflicts between freight and other users when the freight vehicles can't effectively fit in the lanes.

- Bike refuges, cycle tracks and other bike markings should be done in such a way that they do not intrude on the minimum safe turning radii for trucks.

Conclusion. The Alliance recognizes the significant effort in developing this draft plan. We applaud the city's efforts to position Portland as a national and international leader in bicycle transportation. At the same time, we cannot lose sight of the fact that the vast majority of the city's freight, customer and employee movement will continue to rely on motorized vehicles. Policies that increase the travel time for freight and vehicle movement do nothing to help the city achieve its carbon reduction goals. Reduced mobility hampers the development and vitality of businesses and hurts rather than helps efforts to accommodate more employment in an increasingly dense city as our local and regional land use strategies call for.

We believe that bicycling can be successfully integrated into the city's multi-modal transportation strategy. That inclusive strategy led us to invest in light rail, streetcar and other modes early on and has made the city the envy of communities across the nation and even the world. That strategy has been successful in large part because we accommodated alternatives without degrading auto-oriented facilities. We should not abandon that strategy by adopting a plan that makes auto travel or freight movement a secondary consideration.

Thank you for your consideration of these comments. We look forward to working with you on the implementation of this plan as it is incorporated in to the Transportation System Plan.

Sincerely,

A handwritten signature in black ink that reads "Sandra McDonough". The signature is written in a cursive style with a large, sweeping initial 'S'.

Sandra K. McDonough
President & CEO

cc: Commissioner Amanda Fritz
Commissioner Nick Fish
Commissioner Randy Leonard
Commissioner Dan Saltzman

