

Oct. 22, 2018

The Honorable Chloe Eudaly  
Commissioner, City of Portland  
1221 SW Fourth Avenue  
Portland, Oregon 97204

Dear Commissioner Eudaly:

As Greater Portland's chamber of commerce, the Portland Business Alliance (Alliance) represents more than 1,900 small, medium and large businesses throughout the seven county region, all of which rely on a multimodal transportation system in the central city that can efficiently move people and goods to, and through, Portland. Through our affiliate organization Downtown Clean & Safe, comprised of the totality of downtown property owners, we also represent the enhanced service district, which promotes a vibrant and livable central city. The Alliance has long called for a comprehensive, data-driven evaluation of our active transportation network throughout the city, and we are grateful to have been engaged with the Central City in Motion (CCIM) project since its inception.

The Alliance recognizes the critical transportation needs of our region are an inherent workforce issue, and we are eager to collaborate with our members and the Portland Bureau of Transportation (PBOT) to find solutions. With a projected 41 percent increase in jobs in the central city by 2035, investments in both traditional and alternative modes of transportation are absolutely necessary. We fully acknowledge that many of the proposed projects within CCIM have value and the potential to improve our system functionality. It is our intention with this letter to be as constructive as possible, and to urge PBOT to incorporate the feedback that the employer community has regarding serious concerns with certain aspects of the proposed projects.

First and foremost, the Alliance supports the projects designed to increase pedestrian safety, as well as improve access and reliability of public transit. For many residents that currently commute by single-occupancy vehicle (SOV), making the shift to public transit is the most logical transition. As TriMet implements the largest service expansion in its history, the Alliance is committed to working together to ensure enhanced safety and reliability remain the top priority. Public transit must be faster and more accessible. Further, we are not opposed to a more connected bicycle network throughout the central city, but broad concern is shared throughout our community that reducing auto capacity on major arterial roads will have significant economic impacts to our downtown businesses. Careful consideration should be given to those trade-offs, especially considering that the percentage of Portlanders that commute by bicycle has plateaued in recent years.

It should be noted that the Alliance shares a strong partnership with the Central Eastside Industrial Council, the Northeast Broadway Business Association, Go Lloyd and the Pearl District Business Association, among other economic development agencies. It is our understanding that these fellow organizations have significant concerns around several of the projects proposed in their districts. The Alliance supports each of these organizations in urging more responsibility in the implementation of this CCIM project as a whole and will defer to them on projects in their respective districts. With that said, we would like to offer the following positions on each of the projects impacting the downtown enhanced service district.

**The Alliance supports:**

- Burnside – W 10th to E 12th (Project 1)
- NW Everett to Steel Bridge (Project 7)

As previously stated, we support transit improvements. Transit is one of the fastest-growing transportation modes (behind ride-sharing) and is the most effective in terms of sustainable mass mobility. These improvements on Burnside and Everett are smart investments and complement TriMet's existing and planned efforts to make riding the bus more efficient.

**The Alliance supports, with some modifications:**

- SW Jefferson/Columbia/Madison (Project 5)
- SW Salmon/Taylor (Project 8)

While we support the transit improvements outlined in the first phase of Project 5, we would like to see consideration given to the removal of the new bicycle lane, as the existing lane often creates conflict near the Highway 26 portal. This is a well-known problem, and where conflict can be avoided, every effort should be made to do so. The Alliance has also long called for the protection of portal capacity, as businesses rely heavily on reliable access to downtown from the surrounding region. Additionally, Jefferson and Columbia provide critical access to several parking garages and numerous loading docks. Conflict mitigation on these streets is paramount.

Regarding Project 8, the Alliance would like to see a more robust mitigation strategy for the reduced auto and parking capacity. While we are not opposed to protected bike lanes on these streets, it is important to recognize that they are major portals into and out of the central city. While the reduced parking capacity has the potential to improve auto throughput, these blocks also represent a vibrant part of our retail core. It must be noted that most visitors to downtown are not taking their bicycles; rather, they are driving. A recent downtown shopper survey showed that only 1 percent of retail shoppers use their bike to get to their destination downtown when not commuting for work. With that in mind, PBOT must take careful consideration when removing parking and auto capacity within this area in favor of less popular transportation modes – especially considering the high on-street parking utilization rate in the downtown core. Pending the identification of more robust parking mitigation strategies, we would appreciate the opportunity to revisit Project 8.

**The Alliance proposes alternatives for:**

- NW/SW Broadway/Fourth Avenue (Project 2)
- SW Naito (Project 17)

We are opposed to Project 2, but as an alternative, we fully support the removal of all auto capacity on the transit mall. Not only would this produce the same north-south connectivity, but drivers typically avoid these streets already or misuse the designated lanes. While there will be mode conflicts with any of these CCIM projects, turning the auto lane into a protected bike lane would have far less negative impacts on nearby businesses, and the design logistics can be smoothed out as they will be for the rest of the projects. Reducing auto capacity on Broadway and Fourth Avenue would have significant, unnecessary economic impacts on our downtown retail core. Considering a proposed protected bike lane would also remove an auto lane on Naito Parkway (Project 17), Project 2 would severely limit the capacity of our few remaining arterial routes through the city. We do acknowledge that the local improvement district currently funds maintenance of the existing configuration; however, a car-free transit mall is a plausible, exciting alternative that has the support

of Portland's evolving business community. Supporting two adjacent car-free streets through the entirety of downtown Portland is likely not a concept the Alliance would have supported in years past. However, we want to reinforce that supporting alternative transportation is indeed a top priority, and we are eager to work with PBOT to make this a reality for our city.

### **#SaferNaito**

The Alliance supports a protected bike lane along Naito Parkway, as well as the existing bike lanes on the east and west sides. However, the business community remains seriously concerned about the possibility of removing an entire northbound auto lane (Project 17, also known as Better Naito). We have discussed our persistent problems with this project in the past, and it was our understanding that an engineering study, completed by David Evans and Associates earlier this year, evaluated the possibility of relocating the protected bike lane partially into Waterfront Park. The study outlined various alternatives to the current seasonal configuration and included quantified impacts to the park's tree canopy. With respect, we reject the finding that 40 trees would need to be removed to have a protected bike lane completely in the park because the alignment options evaluated consisted solely of routes straight through the adjacent tree line. While we recognize we are not engineers, the Alliance suggests a reevaluation of a protected bike lane through the center of the park, which we believe would not only have minimal impacts to the tree canopy, but also activate the park and protect bike commuters on Naito, as well as passive park activities along the riverside esplanade. In the middle of the park is without a doubt the safest, most attractive option. During multiday summer festivals, we support the temporary protected bike lane in the street but do not advocate for the months long seasonal configuration. There is a chance to capitalize on common ground with this project.

Perhaps most importantly, we cannot overstate the importance of business outreach along the impacted routes. We understand that it is PBOT staff's intention to go door-to-door, and speak directly with business owners and their employees about strategies to mitigate negative or unintended consequences that may result from these projects. We believe a comprehensive outreach plan should be formalized before the projects are approved by council. Any impact to daily business operations, including loading activity and customer access, are serious issues that must be solved transparently. While the Alliance had a seat at the table throughout this process, it is essential that PBOT acknowledge not all impacted community members have been heard. The suggested implementation timeline for CCIM clearly does not allow sufficient time for the quality outreach demanded by a project of this scope. We do our best to represent our members throughout the region, but the bureau has far greater capacity to conduct meaningful outreach to affected businesses, and we would be grateful to partner with PBOT moving forward to ensure this CCIM project has broad community support.

In tandem with the final vote on these various projects, the Alliance insists that solid mitigation strategies regarding the removal of parking capacity and potential conflicts with loading zones be identified. It is irresponsible to move forward on this project without confirmed plans to address these issues. Currently, the proposed parking mitigation strategies are vague at best and, at worst, go against current bureau policy. PBOT has suggested adding capacity at SmartPark garages and working with retailers to provide parking validations, both of which run counter to past bureau direction. While we are skeptical about these options becoming reality, we would support them, should they move forward. Additionally, PBOT has not proposed any plan to resolve loading zone conflicts, of which there will be many. The lack of clarity on mitigation strategies for these issues lead community stakeholders to believe PBOT is disingenuous about solutions to real concerns.

Broadly, CCIM projects must have measurable outcomes. While we understand that council will be voting on 18 long-term projects, many of the projects included on the narrowed one to five year list are acceptable to us, should the stated concerns and alternatives be adequately considered. Knowing the nature of evolving transportation technology, we must insist on broad flexibility for all of these projects; the long-term six to 10 year list absolutely must be reevaluated when the time comes to implement. Variables include the future Green Loop, which could duplicate this exact effort, as well as the skyrocketing popularity of rideshare. Ride-sharing, specifically, is the fastest growing transportation mode and those riders must be accommodated in this and future plans. Additionally, if an implemented project is not performing to the expected standard, or has a negative impact on our transportation system, there should be an opportunity to reconsider the project as a community with objective information on its performance. With permanent bureau leadership uncertain, it is unwise to cement so many significant projects without a codified evaluation strategy.

The CCIM project has the potential to increase the basic capacity of our city's transportation system. We remain concerned that these changes could adversely affect communities who are priced outside of the greater metropolitan area and do not have easy access to viable transit options, and therefore, are more reliant on their personal vehicles. As our community grapples with increased congestion and ambitious climate goals, the Alliance is eager to continue our partnership with PBOT and city council to ensure this project does not have unintended, adverse impacts on our employees, retailers, visitors and community. We are excited about the possibilities this project represents and trust the feedback conveyed in this letter will be incorporated into the final proposal.

Thank you for the opportunity to comment.

Sincerely,



Andrew Hoan  
President & CEO

cc: City Council  
Gabe Graff, PBOT