



November 7, 2019

Oregon Department of Transportation
123 NW Flanders Street
Portland, OR 97209

Oregon Department of Transportation,

On behalf of the Kenton Business Association (KBA) and the more than 200 businesses we represent, we urge you to reconsider elements of the Lombard Multimodal Safety Project scheduled to take place on a 30 block stretch of N Lombard in the Kenton neighborhood. We believe the current design of this project presents a serious safety risk to cyclists, puts an undue burden on our vital small businesses, and will have a profoundly negative impact on our neighbors on this stretch of N Lombard.

Since 2013, the KBA, in partnership with the Kenton Neighborhood Association, the Arbor Lodge Neighborhood Association, and the Portland Bureau of Transportation, has been focused on safety and liveability challenges on N Lombard (please refer to the Lombard Reimagined Project conducted by PBOT). This is an issue we take seriously and we are happy to see ODOT putting resources to improve safety in our neighborhood. We are committed to supporting a project that accomplishes this important goal, but we are convinced that the current proposal does not.

After several meetings with ODOT staff, and after reviewing the most recent project plan presented to us and unchanged since May 2019, we continue to have concerns that the project plan does not align with its stated goal of safety and presents an undue burden on our businesses and residents.

1. We agree with the creation of a center turn lane. This will reduce speed and create better, safer traffic flow for vehicles and pedestrians.
2. We agree with the addition of safer pedestrian crossings and ADA compliant intersections and access points. Of all pedestrian and bicycle injuries incurred from 2002-2011 (34 total), two thirds were pedestrian related (one-third cyclist related).
3. The addition of a bike lane, starting at N Boston and ending at N Fiske (approximately 30 blocks), creates an unsafe condition for cyclists. The proposed bike lane does not connect to any other bike lane; it starts and ends abruptly. Cyclists will have to enter and exit the bike lane in and out of traffic creating unsafe conditions for cyclists and motorists. We have been told by ODOT staff that connection of this bike lane to other bike lanes on N Lombard is not scheduled to take place until 2026, leaving the proposed bike lane isolated for the foreseeable future.
4. N Lombard is a major bus line, with 4 high-frequency (every 15 minutes) TriMet bus lines flowing in both directions throughout the morning, afternoon, and night. There are 10 TriMet bus stops in each direction on this stretch of N Lombard. In the current plan, buses will need to pull into the bike lane at each stop, once again forcing cyclists into and out of traffic, creating an unsafe condition for cyclists and TriMet buses.

5. N Lombard is also a major freight route through the North Portland Peninsula, heavily used by trucks throughout the morning, afternoon, and evening. Approximately 1,750 trucks travel this corridor every day, making up fully 10% of all traffic daily. Introducing cyclists in and out of traffic at random intervals where semi-trucks and delivery trucks are present creates very unsafe conditions for cyclists and freight traffic.
6. PBOT has put massive resources into developing neighborhood greenways and designated bike routes throughout the city of Portland. Those greenways are intended specifically for cyclists to use because they are NOT on major transit routes and are therefore much safer. There are two existing greenway/bike paths that run exactly parallel to N Lombard, one to the north on N Terry St. and one to the south on N Dekum St. The proposed bike lane is completely unrelated and unconnected to these existing and heavily used routes.
7. The addition of clear and abundant signage on N Lombard directing cyclists to the established, safe bike routes on the side streets would be a much safer option than adding a random stretch of bike lane to a crowded and heavily used thoroughfare.
8. The elimination of parking on N Lombard has an adverse effect on our business community in Kenton. Street parking is critical for the health of our N Lombard businesses, many of whom are dependent on customers with vehicles. A pet store, a garden store, a grocery store, and multiple destination restaurants all exist along this 30 block stretch. Eliminating street parking for these businesses creates hardship for their customers resulting in loss of sales.
9. Businesses on N Lombard also depend heavily on the parking lane for their freight deliveries. Eliminating street parking will push freight trucks onto neighborhood sidestreets exacerbating already tense traffic and parking conflicts within the neighborhood. Alternatively, trucks will use the center turn lane to park and unload, creating a dangerous condition for traffic flow, pedestrians, and especially for emergency vehicles.
10. The elimination of parking and possibly DRIVEWAYS on N Lombard places an undue burden on homeowners and tenants of the residential units on the street. Many homeowners on N Lombard depend on street parking, especially our elderly and disabled neighbors. Loss of convenient street parking will cause some residents to have to relocate. Other residents will experience a dramatic drop in their property value based on the elimination of their driveways.

As you know, N Lombard is in need of safety and accessibility upgrades. We support this effort. ODOT's new investment in this area follows a decades-long legacy of infrastructure neglect in North Portland. In spite of hardship, the Kenton community is working hard to ensure positive growth and infrastructure investments. Furthermore, this investment in the heart of our primary business corridor will be one that impacts our community for decades to come.

Given this, we strongly advocate for revisions to the current proposal including eliminating the bike lane, providing new and abundant signage directing bicycle traffic to the existing Bicycle Greenways that run parallel to N Lombard, and retention of the parking lane on the north side of N Lombard. We want to see the positive safety and accessibility potential of this project come to fruition.

Thank you for your attention to these issues.

Sincerely,

The Kenton Business Association