

## TESTIMONY

TO: Portland Hearings Officer  
FROM: Keith Liden  
RE: **LU 24-036049 LDS PD EN** Raleigh Crest (Alpenrose)  
DATE: September 23, 2024

## INTRODUCTION

I'm a Bridlemile resident (north of BH Hwy.), but I often travel through this neighborhood by bike and car. I have reviewed the Raleigh Crest application, and I have several comments regarding the proposed pedestrian and bicycle system and its design. I previously submitted email comments to the staff, which are in the record. I understand the staff recommendation is for denial, primarily for environmental reasons.

I'd like to thank city staff, especially Sean Williams and Tammy Boren-King, for being very responsive and helpful.

## CRITICAL PEDESTRIAN AND BICYCLE DESIGN ISSUES

*Assuming approval is possible, I am highlighting my major concerns regarding the proposed pedestrian and bicycle improvements.*

### Shattuck Multi-use Path Design

I fully support the proposed design and cross section except for the segment adjacent to Tract "A" near Vermont. I strongly object to the "SW Shattuck Road Constrained Cross Section" illustrated on Sheet P-23 of the application package for the following reasons:

- **Critical north-south pedestrian and bicycle route.** As noted in the staff report, existing development and environmentally sensitive areas prevent new north-south connections in this area leaving Shattuck Road as the only north-south pedestrian/bike connection for almost a mile between Oleson Road (>1,200' to the west) and 50<sup>th</sup> Avenue (>3,600' to the east). ***It should be the best it can be – not a substandard mistake.***
- **Substandard and unsafe design.** The cross section, with 5' for pedestrians and 5' for cyclists, a railing on the west side, and a curb/travel lane on the other, is ***completely substandard*** according to any credible source including the *Portland Pedestrian Design Guide*, *Portland Protected Bicycle Lane Planning and Design Guide*, NACTO (National Association of City Transportation Officials), and Portland Parks and Recreation Bureau, which requires a minimum 12' width for major public trails (staff report, p. 56). Contraflow bike facilities, such as this pathway, must have a buffer and meaningful protection from oncoming traffic. This design offers a 6" curb from 35 mph traffic.
- **High bike speeds due to downgrade.** With an average grade of approximately 6% for roughly 1,200' from the top of the hill at Illinois, cyclists (even while braking) will easily be traveling fast by the time they reach the Tract A crossing. As a test, I coasted downhill from Illinois on my bike without braking and reached 29 mph. Even assuming responsible bicyclist behavior, bike speeds can be expected in

the 10-15 mph range. Channeling cyclists into a 5' wide 2-way bike space with no buffer from pedestrians or vehicles in the street is a **reckless design** that's totally unsafe.

- **Discriminatory application of standards.** The reduction in the total street/pathway crossing of the wetland/floodplain is made on the pathway with no reduction proposed for the vehicle lanes, which are proposed to remain at a generous 11'-15'. If the TIA concluded that individual right and left turn lanes were necessary on Shattuck at Vermont, they would be provided to standard without question, and mitigation for environmental impact would simply be dealt with. Why should people choosing to walk or ride be penalized?
- **Disregard for adopted city plan policy.** This design approach is contrary to Portland TSP design and planning policy (March 2020) and the Comprehensive Plan, which state that single-occupancy vehicles are at the bottom of the priority list:

*Transportation strategy for people movement: Implement a prioritization of modes for people movement by making transportation system decisions according to the following ordered list:*

- *Walking*
- *Bicycling*
- *Transit*
- *Fleets of electric, fully automated, multiple passenger vehicles*
- *Other shared vehicles*
- *Low or no occupancy vehicles, fossil-fueled non-transit vehicles (Comprehensive Plan Policy 9.5)*

Unfortunately, the traffic engineering profession continues to disregard adopted plan policy and adhere to its own rules, analytical practices, and design manuals, which continue to prioritize vehicles over walking and bicycling. The traffic study provides the evidence as it covers every minute detail related to the driving experience with only a cursory analysis pertaining to walking and cycling.

- **Need to balance multiple environmental objectives.** I fully support protection of environmentally sensitive areas. However, the city must remember we have multiple environmental objectives - including our commitment to address climate change. How will this equally important environmental commitment be addressed if the city continues to favor vehicles over active transportation? The staff report ironically appears to be more concerned about wildlife being hit by cars without the same apparent concern for people being run over. And the city wonders why more folks aren't walking/cycling to reduce transportation's contribution to greenhouse gas emissions. Clearly, a contributing factor is designs like this where pedestrian and cyclist safety is compromised because they're not in a car.

**Recommendation:**

1. *Retain the pathway cross section as shown under "SW Shattuck Road Typical Cross Section" across Tract "A". The 8' furnishing zone could certainly be reduced, but not to a 6" curb width as currently proposed. A closer evaluation should be made of the vehicle lane widths, and they should be reduced to the minimum necessary. I fully appreciate the wetland/floodplain issue, but it appears that with about a 300' length, widening the skinny portion would result in a potential impact area of about 1,500 to 2,500 square feet that would require mitigation.*
2. *If increasing the area of impact is not allowed by the city/state/feds, a **cantilever design** should be required for the pedestrian portion of the pathway to provide total pathway and buffer widths that are compliant with accepted standards.*

## Sight Distance and Intersection Safety on Shattuck

The development will add a western leg to the Illinois/Shattuck intersection and introduce a new intersection south of Illinois referred to as “Street 1.” I have the following concerns regarding these two intersections based upon the September 4, 2024 TIP by Kittelson and Associates:

- **Assumed vehicle speeds are divorced from reality.** The sight distance calculations are based on the posted 25 mph speed and not the observed average of 30 mph and 85 percentile speeds that exceed 35 mph. This may make sense when no speed data is available, but in this case, motorists are generally exceeding the speed limit by 40%. The staff report brushes the issue aside with this cavalier commentary (p. 17 of the staff report referring to the Kittelson TIS):

*These document that motorists routinely exceed the 25 mile per hour speed limit on SW Shattuck Rd. The average speed is 30 MPH southbound and 31 MPH northbound with 85th percentile speeds being even higher. SW Shattuck Rd. is also classified as a major emergency response route, which is a consideration for any potential traffic calming measures. The applicant team had multiple conversations with City of Portland staff regarding this topic. The City of Portland determined that a spot treatment is less likely to be effective than a corridor-based strategy. A corridor based strategy would be beyond the scope of this project as SW Shattuck Road already carries 3,585 vehicles a day. Staff does note that the improvements to the development site’s frontage including new curbs and sidewalks are likely provide a traffic calming effect.*

- **Vehicle/Multi-use path conflicts.** The sight distance diagrams in the Kittelson TIA (Appendix E, Exhibit A) indicate that motorists will need to stop across the proposed Shattuck multi-use pathway to be able to see oncoming traffic. This will create a built-in conflict between motorists leaving the site and pedestrians/cyclists using the pathway. This could be a particular problem for Street 1 where the southbound bike speeds will tend to be high.
- **Modal conflicts at Illinois.** Most motorists leaving Raleigh Crest will be turning right or left at Shattuck. With limited sight distance, especially looking north, motorists will tend to be totally focused on approaching vehicles and not the pedestrians/cyclists (who have the right-of-way) crossing Shattuck.

### **Recommendation:**

1. *Base the sight distance calculation on the speed vehicles are actually traveling and not the small percentage obeying the 25 mph speed limit.*
2. *Employ design treatments to minimize the potential for conflicts between multiuse path users and motorists at Illinois and Street 1.*

## Illinois Neighborhood Greenway Extension

Illinois Avenue and its intersection with Shattuck will require careful design, and the staff report appears to acknowledge that more analysis will be required. One important element I didn’t see in the staff report is the need to extend the Illinois neighborhood greenway west across Shattuck to the city limit.

**Recommendation:**

*Extend the Illinois Neighborhood Greenway west across Shattuck to the Red Electric Trail, Dover Street and Oleson Road.*

## **Vermont Frontage Improvements**

I support the proposed frontage improvements on Vermont, but they don't extend to the western property boundary.

**Recommendation:**

*Extend the proposed frontage improvements to the west property boundary.*

## **City Responsibilities**

The staff report was disappointing in several instances where the staff incorrectly characterized existing conditions and relevant planned projects leading to a conclusion that:

*The proposed development will generate new bicycle and pedestrian trips, which will be well-accommodated by the planned development. In some areas, travel options for these modes will be significantly improved compared to current conditions (staff report, p. 20).*

Based on today's situation, adding a 3' gravel shoulder would "significantly" improve a roadway where walking along it today is suicidal. The city needs to focus not just on improvements but making them functional, safe, and useful.

SW Portland obviously suffers from an incomplete pedestrian and bicycle network. However, PBOT staff seems to dismiss SW as a hopeless case and doesn't look for the opportunities to make lemonade from lemons. The staff report failed to acknowledge the following:

- P. 21 states there are no sidewalks or bike lanes on Vermont. There are sidewalks on Vermont several hundred feet west of the site that connect with Oleson Road. Gravel shoulders/soft pathways on the north and south sides of Vermont are present west of 65<sup>th</sup> Avenue, and they lead to sidewalks near 67<sup>th</sup>. Vermont improvements should provide connections to these available walking routes.
- P. 24 refers to TSP listed improvements for the area that "will require significant public funding." Staff doesn't acknowledge two SWIM (Southwest In Motion) plan projects that could be partially built to complement this project:
  - Project SS-01 Shattuck Safer Shoulders for the portions not improved by Raleigh Crest. The SWIM cost estimate is \$2 million for the entire length of Shattuck, but a portion could be built a short distance north to connect with existing walkway improvements on the west side of Shattuck.
  - Project SS-04 Vermont Safer Shoulder from the western city limit to 52<sup>nd</sup> Avenue (cost estimate of \$1-2.5 million) could be partially built to the east and west to connect with existing paths and neighborhoods.

**Recommendation:**

*The city shouldn't take a passive role. Assuming this development is approved, the city should actively review the SWIM project list and work to get funding to complete complementary portions of Projects SS-01 and SS-04 to provide connections with nearby paths and sidewalks.*