



October 15, 2009

Metro
600 NE Grand Avenue
Portland, Oregon 97232

Dear Metro Council and JPACT Members:

The Bicycle Transportation Alliance (BTA) is pleased comment on the draft Regional Transportation Plan (RTP). The BTA is a statewide organization of over 5,000 individual and business members with the mission of creating healthy and sustainable communities by making bicycling safe, convenient and accessible.

Metro has long taken a leadership position in creating a region that has sustainable infrastructure, a strong economy, and healthy families and neighborhoods. Metro clearly recognizes that our transportation systems should offer all residents access to work, school, shopping and recreation destinations, while also creating vibrant public spaces, supporting human and environmental health, addressing the climate crisis, and protecting farms, forests, and natural resources.

The BTA is very impressed with and supportive of Metro's *Making the Greatest Place* report and the direction it offers for regional growth. We will therefore open with commentary on the *Making the Greatest Place* report, and then give our input on the RTP.

Making the Greatest Place

Metro took four years of study, analysis and collaboration with regional partners to develop recommendations for how the region can grow over the next 50 years toward making this greatest place. The primary recommendations are:

- Maintaining the urban growth boundary as much as possible to protect natural areas, farms and forestland;
- Investing in and making the most of existing community assets, and utilizing our assets more effectively to expand transportation options to all people; and
- Creating good jobs for the residents of the region.

The BTA lauds these sensible, efficient, and effective principles for action in the region's future plans, including the Regional Transportation Plan.

The BTA must therefore ask if Metro will stand by these recommendations and drive them through the development of all reports, projects and regional plans, including the RTP.

Regional Transportation Plan

Overall Plan Comments

The Regional Transportation Plan (RTP) is the operational document that guides how the region will invest \$20 Billion in transportation projects over the next 25 years. The goals that make up the RTP policy framework are strong, and overall appear to follow in the footsteps of the *Making the Greatest Place* report. They include creating outcomes-based processes to address climate change, affordable housing near public transportation, opportunities for healthy and active living, and addressing equity and environmental justice issues.

The RTP project list – the plan of projects that will be built during the plan horizon – however appears to be mainly business as usual. Of the approximately \$20 billion of proposed projects, 58% are roadway projects, with a focus on increasing the number of lanes, interchanges, and building new roads. While some of these roads may help build out an interconnected system, the BTA finds that the RTP project list fails to meet the recommendations of Metro’s own *Making the Greatest Place* guiding principles. Furthermore, the BTA understands from conversations with staff and stakeholders that **the “no build” scenario actually gets the region closer to meeting greenhouse gas goals than the “full-build” RTP scenario!** These are serious issues for the Portland metro region that must be addressed prior to moving forward.

There are also many strong elements to the RTP, and the BTA believes that Metro is making incremental progress towards achieving a balanced and healthy transportation system. However we must again stress that this incremental progress, on the whole, is not sufficient towards changing the overall reliance on automobiles and the associated consequences, including poor environment, high system and user costs, increased travel time and predictability, inactive and unhealthy population, and inequity of access for the total population.

In attempting to achieve Metro’s *Making the Greatest Place* goals, there is great discrepancy among individual jurisdictions and the project lists they submitted. This highlights a major flaw with the development of the RTP project list – it is effectively a compilation of projects that are submitted by local jurisdictions. The BTA calls for Metro to provide a much more rigorous screening criteria by which projects much pass to make the RTP project lists. (This was done in the evaluation process for allocating the regional flexible transportation funds, including submission guidelines and ranking of projects.)

Metro can actively enforce compliance with the broader regional goals when local jurisdictions conduct their required local Transportation System Plans updates following the adoption of the RTP. Metro should ensure that all local jurisdictions adopt and put forward project plans that reflect the new policy goals in the RTP. This action would lead to important progress at the local level to developing more balanced transportation plans.

In order to more fully forward these goals, the BTA also believes that JPACT, and/or MPAC, should convene subcommittees on equity and global warming.

In order to understand the full picture of transportation investments, the BTA calls for Metro to analyze maintenance and operations in the RTP. The RTP, having only new or added capacity projects, leads to an incomplete picture of the system from the public's standpoint. Much of transportation investments in this region are to fix and maintain an aging roadway system. Without seeing road maintenance it is impossible to determine whether investments equitably serve all communities and it makes the RTP favor adding capacity while the total system is deteriorating. This is analogous to adding a new wing onto a house whose roof is failing in. If Metro were to take on the full range and problem of transportation, we believe that our region would put a much greater emphasis overall on maintaining our assets and living within our fiscal means, rather than just building more.

Bicycle Specific Comments

Overall the BTA finds that the bicycle element of the draft RTP is very strong. We find that RTP section 2.5.5. accurately lays out a vision for a regional bicycle network that aims to build a seamless and interconnected network of bicycle facilities. It also realizes that this network is not merely a bicycle network, but needs to be interconnected with pedestrian, and transit uses that will yield high rates of reducing single occupancy auto travel, yielding a more efficient travel and goods movement network.

We strongly support the creation of the Bike Parkway concept that serves as the backbone of a regional mobility network. These parkways will all provide regional transportation access in a manner that would be safe and convenient for the widest range of transportation users. These routes include off-street, low-traffic, and separated bicycle facilities. At the same time, since regional bike trips start with local origins, Metro has done a good job balancing the need for a complete roadway network to help create safe bike trips that will be regional in nature.

On the down side, overall the community should be skeptical of projects that mention bike, pedestrian, and transit access improvements in project descriptions without more detailed information on the breakdown of project costs. In reviewing projects, the Coalition for Livable Future found that many projects mention improvements to the bicycle and pedestrian network but are primarily road projects that also include minimal or legally required bicycle and pedestrian improvements. Inclusion of bicycle and pedestrian elements in descriptions may indicate merely that mentioning alternative modes in a project is likely to be viewed favorably although the actual investment may be incidental to the overall scale of the project.

Additional Key Comments

Congestion

The BTA has serious concerns with the focus on "congestion" as a negative performance target measure in section 2.3.1. The BTA finds that other more proactive measures such as "travel time" or "travel reliability" would more effectively meet regional transportation goals.

People in the Portland metro region travel fewer miles than people in other metro regions. To date, no metro area has figured out the methods to seriously reduce traffic congestion, but in our region we find that people have shorter trips because they are traveling fewer miles due to compact urban development. This phenomenon yields almost \$1 billion saved in regional transportation costs and \$800 million that stays and circulates within the regional economy.

Also, in many places congestion is a positive index. Busy shopping centers and malls, street fairs, main streets, and town centers *strive to be congested*. Congestion in these environments – the types of land uses encouraged in the *Making the Greatest Place* report – is a positive indicator of business viability, where more people are traveling slowly past or into business places. Another way to view it is that non-congested centers are effectively “dead” with low-land values and rents, with vacancies and little momentum for further development. Ironically these areas often feel vacant, the converse of congested.

Congestion is more clearly a negative indicator on an open roadway, highway or freeway, mainly because it slows travel times and product delivery. Again, measuring travel time and product reliability is a more direct measurement of importance.

Mobility Standards

On the heels of the above comments, the BTA strongly believes that automobile mobility standards are poor measurement indices for transportation system performance and has traditionally led to models and engineers recommending system expansions. For this reason, Metro has lowered the bar of accepted mobility standards, because these measures are not attainable. The BTA believes that these traditional mobility standards are simply not relevant and are poor indices on which to base transportation investment choices.

The BTA recommends that Metro completely cease using roadway mobility standards. As the nation’s leader in land use development and transportation planning must develop a new index that will more accurately measure the total and relative performance of the system.

Thank you for considering and acting on these comments as you move the RTP and other public infrastructure plans forward.

Yours truly,

A handwritten signature in black ink, appearing to read 'S. Bricker', with a stylized flourish at the end.

Scott Bricker
Executive Director