URBAN Greenspaces INSTITUTE

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RE: Draft 2018 Metro Regional Transportation Plan Update

Metro Councilors and Chair Hughes:

The Urban Greenspaces Institute (UGI) offers the following comments on the proposed 2018 Regional Transportation Plan (RTP). UGI has been instrumental in creation and development of the Metro Parks and Nature Program, and we remain active in a variety of regional conservation and livability issues and forums.

We appreciate the important progress represented in this updated RTP, particularly those around the twin challenges of equity and climate change. In spite of this progress, however, we find a number of deficiencies in the RTP that hinders our regional progress towards improved mobility for all, climate justice, as well as vibrant and accessible urban greenspaces, and other important goals.

In a very tangible way, automobiles, auto-dependency and the infrastructure required to support them is crowding out real solutions to our mobility and sustainability challenges. Automobiles dominate space-limited roads for both travel and parking, crowding out dedicated bus and bike lanes, bus stops, and other alternatives. Automobile travel speeds on the region's arterials create public safety hazards, which necessitate pedestrian safety crossing improvements. On a larger scale, expensive road widening and automobile congestion abatement consume limited transportation dollars, and restrict needed investments in transit, bike, and pedestrian networks as well as improved crossings for fish and wildlife. None of the proposed road widening projects takes us closer to meeting our carbon emission reduction goals – they undermine our progress toward these goals.

In the face of the ongoing climate crisis, we need fresh, creative thinking about transportation projects and spending. How can we invest in alternatives to the automobiles to ease the transition to more sustainable and community-strengthening transportation choices? Let's make it harder for folks to choose single-occupancy vehicles, and easier to choose alternatives like transit, carpooling, telecommuting, bicycle, or walking. We need a mix of solutions like dedicated bus lanes/bus rapid transit,

more connected and safer bikeways, safer crossings for pedestrians, robust employer-led transportation demand management, and more.

Below we offer specific comments on certain elements of the proposed RTP.

Project Lists
We urge Metro to remove the West Hayden Island Rail Access and Rail Yard projects from both the constrained and strategic project lists, as well as the regional freight strategy. The need for WHI as industrial land is premised on an old-fashioned vision of greenfield development of industrial port facilities. This outdated vision discounts the emerging patterns of intensified use of existing industrial lands, redevelopment of brownfields, and more small-scale economic development within existing road and utility networks.

We also urge Metro to remove the I-5 Rose Quarter Expansion from the constrained and strategic project lists, as well as the regional freight strategy. The inclusion of this project in the RTP is at odds with the plan's equity and climate resilience goals, and it will absorb millions of dollars that would be better spent on public safety and infrastructure for automobile alternatives. UGI is not alone in our opposition to this project and we stand with a broad coalition of partners who believe the region has more important transportation priorities.

In general UGI believes that there are too many funds being devoted to highway projects and road widening, and insufficient investment in transit, biking/walking, and transportation demand management. Most highway projects create induced demand for more automobile travel, and do not bring people to make the best personal choices for mobility that serve the common good. We need to begin to recognize that automobile congestion alongside uncongested transit and bike arterials can offer people incentives to leave their cars at home.

Furthermore, the constrained projects map reveals that many, if not most, of the priority road and bridge projects are located at the periphery of the region. UGI believes that too much road development/widening, particularly in areas that are on the outskirts of the region, can facilitate land development/intensification where it is least appropriate from a growth management perspective. A pattern of over-investment in transportation networks at the periphery will create future demand and expectations for urban growth boundary expansions, or at least, unnecessarily accelerate this process. At the very least, we would like to see many of these road development/widening projects moved off the constrained list and onto the strategic projects list. This would enable the region to elevate more public safety, bike/pedestrian, and transit projects onto the constrained project list.

Inadequate Consideration for Green Infrastructure
The proposed RTP gives inadequate consideration to green infrastructure, and offers only broad brush statements with little needed specificity on how and where green infrastructure is to be integrated into the various prioritized projects. This lack of

specificity represents a giant missed opportunity for Metro, which is replete with an entire science staff tasked with managing the region's parks and natural resources.

A more thoughtful integration of green infrastructure with the RTP would address needed improvements in fish and wildlife habitat connectivity, water and air quality, climate change mitigation, flood and drought resiliency, livability and human health, and more. It is no longer an option for regional transportation planners to ignore green infrastructure in their planning and project prioritization effort, nor to defer consideration of it to the project design and scoping phase. Green infrastructure needs have to be included and related to the various human transportation needs in the RTP.

Important questions around green infrastructure that demand answers from the RTP authors and development team include the following:

1. Where are the crucial wildlife and habitat corridors and how will future projects address their fragmentation and remedy barriers to movement by native fauna?
2. How can existing Metro natural resources inventory data be used to improve and refine project prioritization *and* design to improve habitat connectivity, remedy anthropogenic barriers from existing and proposed transportation infrastructure, as well as restore ecological processes (runoff, flooding, etc.)?
3. Goal 6 of the RTP calls for the region's fish and wildlife habitat and water resources to be protected from the negative impacts of transportation. What are the relevant RTP performance measures and targets to be added? How will progress be tracked?
4. Where are the policy criteria that specify how the RTP projects were selected/prioritized to balance the need for mobility and travel lanes with the 'design characteristics of healthy arterials' (Table 3.10, which include considerations for safe travel speeds, community access, bike/ped safety, noise and air pollution, accessibility to users of all abilities, support for green infrastructure, and more)?

Table 3.8 (Design Classifications for Regional Motor Vehicle Network) illustrates the lack of serious consideration for green infrastructure in the RTP. This table includes graphics depicting 'illustrative design concepts' for different road types, which show street trees in cross section but do not call out dedicated space for street trees in right-of-ways. Nor are street trees mentioned anywhere in the RTP. Instead the document references Metro Livable Streets Handbook and mentions the need for 'performance-based design and flexibility in design to achieve desired outcomes.' What are these 'desired outcomes'?

UGI found the RTP Section 3.3.4 (Design for Stormwater Management and Natural, Historic and Cultural Resource Protection) lacking in needed detail on how projects can be properly planned and implemented to address various environmental challenges. The environmental effects of transportation infrastructure deserves special consideration, and future investments in the region's transportation corridors should elevate efforts to reconnect fragmented aquatic and terrestrial ecosystems and natural flows.

UGI welcomes the RTP's acknowledgement of the Intertwine Regional Conservation Strategy as a tool to reconcile future transportation investment with languishing needs around wildlife and habitat connectivity. However, the RTP needs to go farther to identify conservation-related performance targets for new transportation investments to ensure each new transportation project improves outcomes for fragmented regional aquatic and terrestrial ecosystems. It is not enough to simply list off the number of regional high-value habitats intersected by the proposed RTP projects.

At present an Intertwine regional habitat connectivity work group is developing tools for use by transportation planners to assess and document priority wildlife crossings for improvement under future road or other transportation improvement efforts. Another goal of the Intertwine group is to help specify technical standards for fish and wildlife crossings for use in future road improvement projects.

Ultimately, UGI hopes to see the work products from this Intertwine habitat connectivity work group will be used to update the network vision of a future RTP, showing what wildlife habitat connections are high priority for improvement in relation to the region's transportation network. For example, each of the twenty-four mobility corridors discussed in the RTP appendix should have an explicit discussion of the wildlife habitat corridors bisected by each, with specific callouts on ecological improvements needed to reduce habitat fragmentation that could be implemented as part of a future transportation improvement project.

In lieu of lists of specific locations to optimize wildlife/habitat connectivity along these travel corridors, UGI requests that this RTP adopt a policy of providing at least one fully-connected/improved wildlife/habitat corridor every 1-2 miles for throughways. This approach would parallel the conceptual spacing of throughways and major arterials proposed on page 119. As travel speeds are higher on throughways, there is a greater need for wildlife habitat connectivity considerations within these corridors for the benefit of both wildlife and public safety.

Finally, it is useful to see the RTP authors in section 4.6 acknowledge that:
"Future work by Metro and partners could include an inventory of culverts in the region that need repair or replacement to accommodate endangered or threatened fish species." Road crossing inventories for fish passage have been updated in recent years by the City of Portland and Multnomah County, but other road jurisdictions have incomplete or outdated inventories. UGI suggests that development of a comprehensive inventory of fish and wildlife barriers created by the transportation network should be a priority for funding within the RTP as a first step towards identifying priority corrections and mitigating strategies for future RTP projects.

Public Safety – For People and Wildlife
The RTP trumpets that two-thirds of the projects address safety but we wanted to see a better description of how this safety filter was developed and applied. Much of the backlog of needed public safety improvements derive from roads that were originally designed and built to facilitate fast movement by automobiles. We suggest that RTP

planners examine simple remedies like reduced travel speeds to address needed safety improvements for both people and wildlife.

Parking and Travel Demand Management
In general, UGI believes that parking and travel demand management are under-developed and under-utilized in the proposed TSP.

Local jurisdictions and major employers need to do more with parking demand management as another tool to shift people out of their automobiles and into other transportation alternatives. We have read and reviewed the RTP companion 2018 Regional Travel Options strategy: it is missing targets and is inadequate to the task before us. The 2018 Regional Travel Options strategy has no information on what percent of small, medium, and large employers have programs to actively reduce automobile commuting and implement their own in-house TDM programs. Nor do we know at what stage of maturity these programs are. Without major employers engaged in this challenge we will fail as a region.

The lack of information on existing transportation demand management and measurable targets for both local jurisdictions and employer-based commuter reduction programs is worrisome. The draft TDM provides no targets for the percent of major employers with active programs although the Oregon Employee Commute Options rules require work sites with more than 100 employees to have workplace programs. We need a region-wide commitment to employer-led transportation demand programs. Where are the employers in this conversation and how many of the major employers have fully developed transportation demand programs for their employees? Why is this missing from the RTP?

Weak and Inadequate RTP Policy Framework (Section 3.5)
UGI suggests the following changes to the RTP policies to strengthen key elements of the document:

> Policy 6 - In combination with increased transit service, ~~consider~~ use ~~of~~ value pricing to manage congestion and raise revenue ~~when one or more lanes are being added to throughways~~.

UGI supports a more strongly-worded Policy 6, to prioritize value pricing that properly manages automobile demand for limited roadways and shifts people out of single-occupancy vehicles and into other travel mode choices.

> Policy 9 - Minimize environmental impacts of the motor vehicle network using Green Street infrastructure design, <u>street trees, wildlife habitat or waterway crossing improvements,</u> and other approaches.

Please include other green infrastructure mitigation tools in the list of Policy 9 measures.

The RTP provides a hierarchy of street types (e.g. throughways, arterial streets, collector streets, local streets). However, no where in the plan is a hierarchy of transportation uses provided to indicate where, when, and how more efficient transportation modes (like high-capacity transit) gains precedence over resource-intensive, low-efficiency modes

(like single-occupancy motor vehicles). Please consider including such a hierarchy, which could be modeled on the City of Portland's.

The Interim Regional Mobility Policy and measures (Section 3.5.3) are inadequate and incomplete because they only measure automobile traffic congestion. UGI requests that Metro and its regional transportation partners develop more robust and meaningful measures that reflect other travel modes and choices, as well as financial, environmental and community impacts.

Separately, in Section 3.6.1 the RTP states "cities and counties who own the roads used by bus transit *could* partner with the transit agencies to implement transit priorities treatments." [emphasis added] UGI believes that the region's cities and counties *should* make road improvements that prioritize transit and other automobile alternatives. We believe that this directive should be an explicit part of the RTP's policies. Indeed, transit will not become more accessible or convenient *until* transportation agencies begin making automobiles less convenient for residents.

Measuring [Underwhelming] Outcomes and the Climate Smart Strategy
The draft plan will reduce per capita greenhouse gas emissions by 21%, which falls short of the 25% goal set by the State. We request that Metro and the RTP partners re-examine their project list to elevate projects that will move us closer to this 25% GHG emissions reduction, and to demote projects that will hinder our progress on this important goal (see above for suggested changes to the projects list). The RTP reports that sidewalk, bikeway, and trail completeness near transit will be just 76%, 72%, and 55% complete by 2040 with the current mix of funding and projects. These anticipated results are inadequate and we can do better. More investment in bike/pedestrian infrastructure connectivity is needed so that people can access transit by foot or bike safely so that more people are encouraged to get out of their cars and explore life-sustaining and planet-friendly alternatives to the automobile.

We are disappointed to see the very small increases in the active transportation and transit mode shares both within and across the region that is expected under the proposed RTP. Access to transit and bikeways is similarly limited under the proposed RTP. The Climate Smart Strategy-derived climate change targets for a 25% decline in per capita car/small truck emissions over 2005 levels are not met for the constrained investment strategies. To be meaningful, this suggests that the RTP developers need to consider a different mix of projects that more significantly accelerates and advances access to transit and active transportation alternatives, discourages automobile use, and eases the region's dependence on high-carbon demand transportation choices.

The discussion of potential habitat impact from the RTP on page 7.72 states that although proposed RTP transportation projects intersect RCS-identified high-value habitats, these projects do not necessarily impact a given environmental resource. We disagree with this sentiment: the regions' extensive road and transportation networks cause ongoing harm to the region's remaining fish and wildlife habitats, clean water, and other ecosystem values and processes. By deferring the consideration of potential project harm until the design

phase, we miss out on opportunities to determine where we might align transportation and habitat network improvements in a more strategic fashion. Instead, harms to remnant natural habitats are mitigated to the State of Oregon's relatively low standards of compliance (for fish passage only, typically, since no wildlife crossing technical standards exist). Increasingly, we are seeing Oregon Department of Transportation trade away any potential transportation project habitat benefits away from the region and towards perceived high-value areas on the Oregon Coast, via the new fish-passage habitat bank (see https://www.dfw.state.or.us/fish/passage/mitigation.asp for more information).

In Section 7.4.14, the RTP admits that no habitat target exists for the RTP. We view this as a missed opportunity: transpiration planners should work to craft such targets. We suggest very general targets would be of more benefit, than having none at all.

Missing Analyses
Appendix F, the 2018 RTP Environmental Assessment and Potential Mitigation Strategies is missing, so we cannot fully evaluate the adequacy of this plan. At what stage will the public be afforded the opportunity to review and comment on this and other missing appendices?

Thank you for the opportunity to review and provide input on the proposed 2018 RTP update. We look forward to continued discussions with you and your staff on this important guidance document.

Sincerely,

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