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October 11, 2021

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RE: Pedestrian Design Guidelines – September 2021 public review draft

Dear Michelle:

Thank you for the opportunity to review the draft 2021 update to the Portland Pedestrian Design Guidelines (PDG). As a member of the PDG community advisory committee, I am pleased to see some improvement in the guidelines to hold and expand space for green infrastructure, to improve safety and enhance the pedestrian experience. The pedestrian zone and our public streets are one of the City's most extensive assets, and need additional investment, design and care to make the City healthy, connected and equitable.

The Urban Greenspaces Institute advocates for and leads collaborative urban greenspaces conservation across the Portland metropolitan region. We work to safeguard and reclaim greenspaces as places for people and wild nature, and to address the climate crisis. In all our work we seek to redress social and environmental injustice, to create healthy, connected and resilient communities.

Below we offer both general and specific comments about the proposed 2021 PDG.

General Comments

The City of Portland's Pedestrian Design Guide (PDG) was last updated in 1998 – this is a once-in-a-generation opportunity to reset PBOT street design to enhance opportunities and safety for pedestrians, as well as cyclists and street trees. The PDG update gives the community a chance to incrementally shift right-of-way space away from automobiles and towards more sustainable travel modes like walking and biking, and to create more space for trees. All of these things are crucial to our City's climate change response.

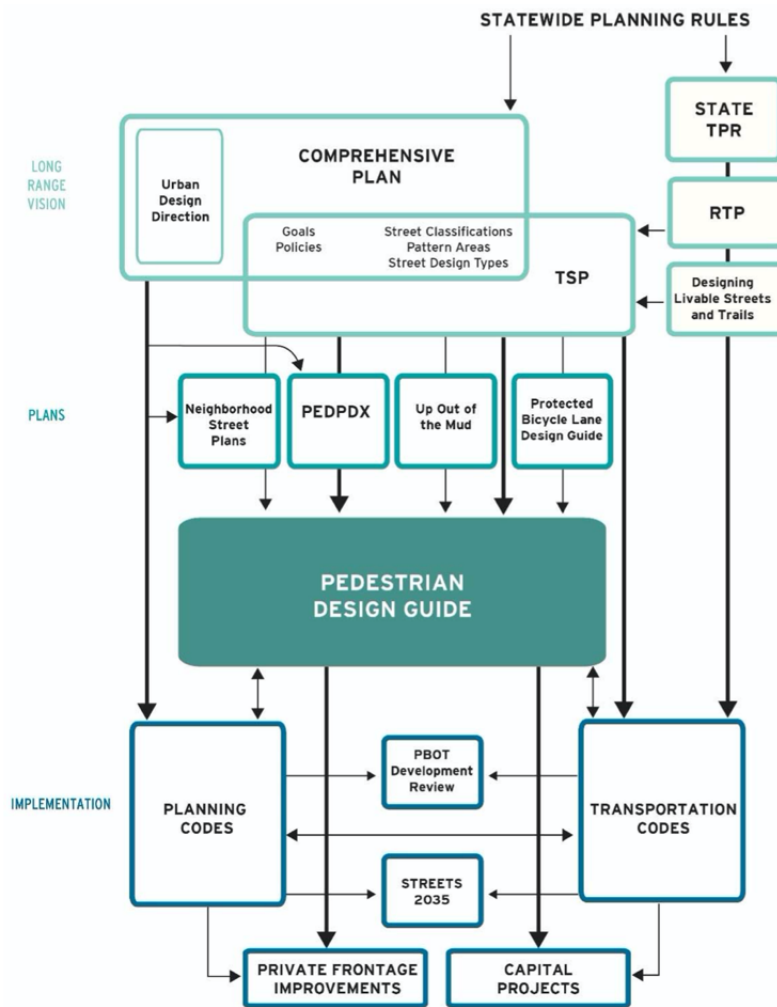
There are some good things in this September 2021 PDG public review draft, but there are also a lot of missed opportunities. In particular, the PDG is weak on finding creative ways to hold space for medium- and large-form trees within street right-of-ways. We appreciate PBOT's proposal to allow for curb bump outs to create more space for street trees in settings with constrained furnishing zones (aka planting strips). But this is just one approach to the challenge, which will likely only be implemented during large capital projects. There are plenty of smaller ways that the PDG can be adapted to increase space for trees and improve the pedestrian experience.

One notable omission from the draft 2021 PDG, is a positive statement acknowledging that trees are an essential element in the street environment and pedestrian

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experience. The 1998 PDG is stronger in this regard and clearly states: “Street trees are a highly desirable part of the pedestrian environment, especially large-canopied shade trees. Every effort should be made to provide enough room in the Sidewalk Corridor to accommodate trees in addition to pedestrian travel.” (1998 PDG, p. A-6)

PBOT’s failure to include a proactive statement supporting trees in street ROWs stems from the incomplete Toole Design plan and policy review, which does not mention the City’s urban forest management plan, urban forestry action plan, and City-wide tree planting strategy. These omitted plans and policies define achievable urban forest canopy goals, identify tree canopy-deficient neighborhoods, and specify a mix of tree planting, care and investment strategies.



← Toole Design figure 4 showing inter-relationship of plans, visions, and implementation tools that impact the 2021 Pedestrian Design Guide. Note that, although the Metro ‘Designing Livable Streets and Trails’ guide is mentioned, there is no direct City policy/plan linking trees, tree canopy, or climate adaptation to the PDG.

The Toole Design review mentions of the Title 11 tree code, but the tree code does not identify tree canopy goals or define how the City will meet those goals. As a result, the conclusions of the PDG plan and policy review leaves out any acknowledgment and accommodation of the City’s needs to preserve and expand urban tree canopy. This is a glaring omission because street right-of-ways (ROWs) are a large percentage of public space within the City where additional tree planting and maintenance is needed to meet our Climate Action Plan goals. By including these higher-level City tree plans and goals, the PDG could properly frame the challenges of space-constrained pedestrian

zones and right-of-ways. We are not just optimizing travel for pedestrians. There are other worthy City goals to be addressed within our public streets.

Similarly, the Toole Design focus group and peer city review is deficient because it only looks at a handful of cities (Seattle, Denver, Washington D.C., Boston Austin). All the cities – except Boston – have street ROWs that are wider and less constrained than is typical in Portland. In the case of Boston, there were no specific approaches incorporated into Portland’s PDG approach. One key finding from the peer city review is that 4 ft should not be the maximum furnishing zone width. In particular, the Toole Design review recommends that “the PDG update should evaluate where there are opportunities for wider furnishing zones and what potential options there might be to meet the needs of the furnishing zones in other places or ways.” Curiously, these findings and recommendations are ignored in the 2021 PDG public review draft. It would be more useful to include case studies from more cities like Portland with space constrained right-of-ways, including cities from Europe and abroad (not just automobile-dominated U.S. cities).

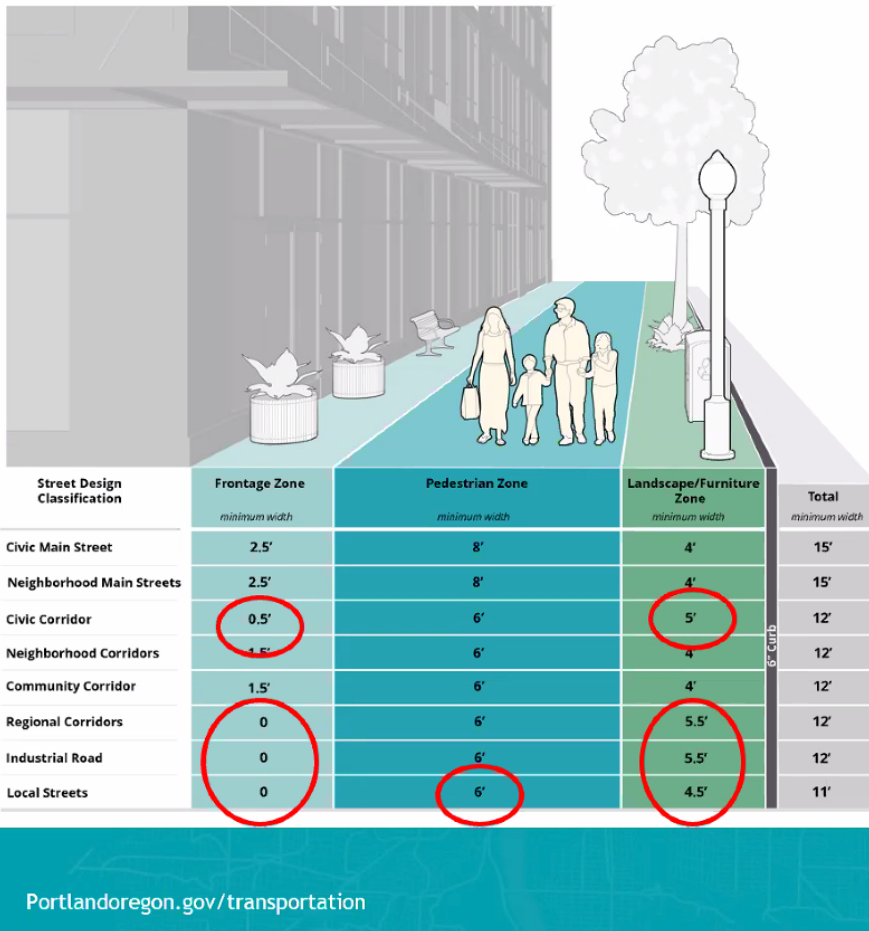
Specific Comments

Required sidewalk corridor widths by Street Design Classification (Table B-3) – We appreciate that an additional one foot was added to the furnishing zone width along regional corridors and industrial roads, but these street types represent only a tiny fraction of the overall road network within the City. Overall, we are disappointed to see the public review draft furnishing zone widths in Table B-3, which preserves the narrow 4-foot furnishing zone along the majority of Portland’s streets. We encourage the City to explore opportunities to create greater furnishing zone widths, using some of the following suggested approaches:

- 0-foot frontage zones,
- Pinch points for trees,
- Meandering pedestrian through zones,
- Sidewalk variation process that gives greater consideration for trees, and
- Expanded use of sidewalks on one side of roadways/pedestrian shared streets

An earlier draft Table B-3 from October 2020 that we reviewed in the stakeholder advisory meetings had proposed 0-foot frontage zones along local streets, industrial roads, and regional corridors to make room for minimum furnishing zones widths of 4.5 to 5.5 feet. Please reconsider an allowance for letting the frontage zone shrink to 0-foot width in space-constrained circumstances (at least along Local Streets) where additional furnishing zone width is needed for trees and other public infrastructure/needs. This approach may not be feasible in all circumstances but should be allowed by right where appropriate.

Street Design Classifications



October 2020 DRAFT Pedestrian Design Guide Table B-3 showing instances where frontage zone widths were narrowed or eliminated to expand landscape/furnishing zone widths. In the October 2020 draft PDG, along Civic Corridors, Regional Corridors, Industrial Roads and Local Streets the frontage zone was narrower than what is proposed under the September 2020 PDG to accommodate slightly larger furnishing zones.

Another approach would be to allow pinch points for trees within the pedestrian corridor. Instead of requiring a uniform 6-foot minimum-width pedestrian through zone (PTZ), the City could allow for short 5-foot wide PTZ pinch points around trees, to accommodate larger tree wells in space-constrained settings. This approach is compatible with ADA minimum requirements and is allowed under current pedestrian design. There are many examples of this from streets across Portland. Unfortunately, the 2021 PDG would prohibit such pinch points for trees but allow them for utilities (under B.5.2, p. 37).

A related approach would be to allow for meandering pedestrian through zones to accommodate intermittent and discontinuous frontage and furnishing zones. Neither frontage nor furnishing zones may need to be a continuous uniform width. So why could the City not allow furnishing zones to bulb out around trees and the corresponding frontage zone to shrink to zero? This would allow the furnishing zone to shrink between tree wells to accommodate an enhanced frontage zone for sidewalk cafes, planters, and other needed flexible spaces.

Finally, the City should consider a sidewalk variation process that gives greater consideration to space for trees. The process outlined under B.5.1 for constrained site conditions gives no consideration to the City’s urban forest canopy needs. In space-limited settings, the furnishing zone (where trees go) is among the first to be reduced or eliminated entirely, even before considering

the options to implement a short narrowing of the pedestrian through zone (pinch points) or elimination of the frontage zone. At a minimum, PBOT should consider the site-specific urban tree canopy needs in relation to the City's adopted tree canopy goals. There are new tools and resources to aid in such an assessment, including [BranchOutPDX and other resources from Urban Forestry](#).

To expand planting spaces for trees, PBOT might also consider how it could extend the use of sidewalks on one side of roadways and/or pedestrian shared streets. As proposed in the 2021 PDG, these two options have numerous minimum requirements and are not allowed in many settings. Along low-stress Local Streets one or both options may be feasible, especially along Portland's numerous unimproved roadways. One way PBOT could incentivize needed street upgrades along unimproved roadways would be to allow pedestrian shared streets to be developed in conjunction with private developments (not just through capital projects, as proposed). This small change could benefit both public safety and urban tree canopy.

These are a few ways that additional space for trees could be integrated into the PDG. Portland can and must do better than what is proposed under the September 2021 PDG public review draft! Taken together, these new proposed sidewalk corridor widths and design specifications will not allow Portland to meet its modest urban tree canopy goals, so they should be revised to provide more space for trees. Throughout the PDG, we find that PBOT is optimizing the pedestrian zone exclusively for pedestrians, not balancing these needs alongside other worthy City goals like preservation and expansion of the urban forest canopy.

Structural Soil and Silva Cells – Please update section B.1.3.a Pedestrian Through Zone Width to acknowledge and allow by right below-grade structural soil and 'Silva Cells.' Tree well encroachments into the pedestrian through zone are allowed with conditions in the PDG, and this is an important improvement to the PDG. However, in addition to ADA compliant walkable surfaces and tree grates, please also acknowledge that structural soil and Silva Cells may be used beneath the pedestrian through zone. Without this acknowledgement, PBOT permit staff may require a public works alternative review, which can add unnecessary review and cost to projects seeking to implement these proven technologies to create more space for tree roots in urban settings.

Dedication of additional ROW space to furnishing zone – We support the language proposed under B.1.3.d Exceptions to Table B-3 Sidewalk Corridor Widths. Although it is uncommon, wherever there is additional space within ROWs, that space should be dedicated to trees.

Tree well and planting strip design– In section B.2.3.a Tree Wells and Continuous Planting Strips, we appreciate that PBOT is thinking about the appropriate design for tree planting. But we are concerned about the overly prescriptive standards specified. For schools and churches within the Single Dwelling Zone, and residential properties with 4-6 units in the Multi-Dwelling Zone, please allow for both tree wells and continuous planting strips by right, and do not require that they complete a public works alternative for the non-preferred design approach. More flexibility is desirable in these circumstances, and we need to make it easier for applicants to do continuous planting strips - where appropriate. We don't need the City encumbering applicants with a public works alternative process to preserve space for trees!

In 2020, Portland adopted the Residential Infill Development reforms, enabling up to four residential units within the single-family residential zone, with the option of up to six units if some are permanently affordable. Gentle in-fill development like that proposed under RIP is now City policy – it should not trigger required paving in the furnishing zone, and creation of tree wells.

Many properties in these settings can accommodate continuous paving strips and the reduced impervious areas that they afford.

On page 21, the PDG states that exceptions to Table B-4 will be reviewed on a case-by-case basis in accordance with listed criteria by the City engineer. We submit that these decisions belong not with a PBOT engineer, but rather with the City forester.

For continuous planting strips, please specify a lower maximum surface area that may be hardscaped AND require that materials be permeable to allow for surface water infiltration. The allowance for up to 50% of planting strip areas to be hardscaped is too high – a more reasonable threshold would be 30%. We do not need additional impervious areas within furnishing zones!

For tree wells, please do not specify a maximum tree well length of 10 feet. Along many of Portland's narrow and constrained furnishing zones, a greater tree well length may be appropriate and a longer tree well length may afford additional space for healthy tree rooting area and growth. Please defer such design considerations to the City forester, not PBOT engineers.

Sidewalk level bicycle facilities – The design standards for sidewalk level bike facilities (B.4) make little or no allowance for trees in the furnishing zone. This is unacceptable. PBOT engineers seem to think that trees are an afterthought here and that space for bikes take precedence. The minimum required furnishing zones of 2 feet do not create sufficient space for trees. The decision schematic for space-constrained ROWs (Figure B-23, p. 32) allow for PBOT designers to reduce the furnishing zone to zero in these settings.

We dispute the whole premise of the need for sidewalk level bike facilities. Bikes can travel at speeds that create pedestrian hazards. Instead of putting bikes on sidewalks, PBOT should exercise its authority to calm automobile traffic in the street, so that streets are lower stress and more welcoming for bikes. Bikes on streets lower overall traffic speeds, enhancing safety for both pedestrians and bicyclists. Please eliminate or rewrite the whole of section B.4.

Administrative process and fee burden for alternative design – Section B.5. outlines variations for sidewalks requiring PBOT approval. For variations in the specified design standards for trees, please carefully consider the administrative process and fees burden that PBOT will impose on applicants. We are not familiar with [the Public Works Alternative Review process](#) but it should be scrutinized and – if possible – updated to make it easier and more affordable for community members to implement curb bump outs for trees in the ROW, where appropriate.

We appreciate the opportunity to review and provide input on the 2021 update to the Pedestrian Design Guidelines. As the PDG update process moves forward, we look forward to continued engagement with PBOT, City Council, and others.

Sincerely,



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