

November 13, 2015

Oregon Transportation Commission
355 Capitol Street NE, MS #11
Salem, OR 97301-3871

Re: Draft Oregon Bicycle and Pedestrian Plan

Dear Commissioners,

We the undersigned would like to express our gratitude to the Oregon Transportation Commission (OTC) and Oregon Department of Transportation (ODOT) for your commitment to improving conditions for walking, biking, and transit in Oregon. A comprehensive Oregon Bicycle and Pedestrian Plan is crucial to our success in making these healthy and affordable modes of transportation safe and accessible for all Oregonians.

In pursuit of our shared goals, we would like to commend ODOT on the effort to date with the Draft Plan and also express some of the concerns that we would like to see addressed in the Oregon Bicycle and Pedestrian Plan prior to final adoption.

Existing Conditions

In order to be successful, the Oregon Bicycle and Pedestrian Plan needs a better assessment of existing conditions. ODOT's Region 1 Active Transportation Needs Inventory and Assessment provides an excellent process and example, and should be replicated statewide. All the routes from this assessment should be incorporated into the plan, and the plan should set policy direction, assign accountability, and include a timeline for completion of similar inventories in all of ODOT's regions.

Both the Oregon Transportation Options Plan and the Oregon Freight Plan include comprehensive evaluations of existing conditions in terms of service coverage by geographic area and anticipated freight demand by corridor. A similar approach to identifying current and future bicycle and pedestrian facilities should be included in the Oregon Bicycle and Pedestrian Plan.

The US Department of Transportation Federal Highway Administration also recommends¹ a far more comprehensive "Assessment of Current Conditions and Needs" than the Oregon Bicycle and Pedestrian Plan currently includes. Oregon's draft does not meet Oregon's standards in other plans nor does it meet the current Federal recommendations.

¹ http://www.fhwa.dot.gov/environment/bicycle_pedestrian/guidance/inter.cfm

Safety

At the highest level, this plan should reflect a policy that will "Provide well-designed streets and highways that are safe for people biking and walking." All related strategies should pursue this directive, including both infrastructure elements and related education and encouragement components. The recently adopted Transportation Options Plan incorporates comprehensive information about state-supported programs such as Safe Routes to School, which should be more closely referenced in this Plan. Further, there is a missed opportunity in not more strongly linking such education/encouragement programs with infrastructure built by the state and local partners.

Equivocation in the language throughout the plan's policies and strategies dramatically undermines its intent. Creating safe streets for people walking and biking requires narrower travel lanes, slower vehicle speeds, more physical protection, more sidewalks and bike lanes, and savvy and comprehensive public education. Nowhere in the plan language is this direct and well-understood approach to safety made into policy. This omission will not serve Oregonians of all ages walking and biking now or in the future.

Performance Measures

We strongly urge the Commission to request inclusion of an explicit commitment to including true Multimodal Level of Service performance measures in the context of the Oregon Bicycle and Pedestrian Plan. It is arguable whether or not such a measure is ready to direct projects today, but it is essential that Oregon commit to applying a new multimodal standard within the plan period. Merely identifying it as a potential new tool is insufficient; this plan must make commit resources to developing this approach and include policy ensuring its adoption.

Maps

Updates to the functional classifications of ODOT facilities incorporating 2015 conditions are required in order to accurately reflect Oregon's commitment to improved bicycle access on specific streets. Further, the plan needs to include specific projects that make up a complete network of Oregon's desired bicycle and pedestrian facilities. Without this level of policy change and route identification, the plan lacks a comprehensive approach to achieving its stated goals.

Both the Oregon Transportation Options Plan and the Oregon Freight Plan include maps of current service areas, levels of coverage, and anticipated demand for each mode and topic plan. A similar approach should be incorporated in the Oregon Bicycle and Pedestrian Plan, yet does not exist in this Plan.

For an example of how this can be accomplished, please see the draft Statewide Bikeway Network of the Arkansas Bicycle and Pedestrian Plan.² This plan is

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http://www.arkansasbikepedplan.com/sites/arkansasbikepedplan.com/files/Complete%20Plan_LowRes.pdf

currently out for public comment in the State of Arkansas, and Oregon's omission of a similar commitment to complete bicycle and pedestrian networks will immediately stand out as an error that will get worse over the 25 years of our plan's lifespan.

Equity

It is our assessment that a more thorough treatment of Oregon's commitments regarding racial equity is required. The plan should, at the least, identify anticipated and current user groups by race, color, and/or national origin and identify how and where Oregon will help ensure access to safe walking and biking infrastructure for people of color, low income communities, and those who cannot or do not drive a private vehicle. In addition, there needs to be additional language around how diverse groups will be directly involved in decision making and addressing the historical context that impacts access to, and participation in, the benefits of walking and biking.

Title VI of the Civil Rights Act and Americans with Disabilities Act legal requirements should be the baseline for this plan and policy language should reflect our state's commitment to go beyond the baseline to create truly equitable outcomes for our transportation system and all Oregon residents.

Thank you for taking our comments into consideration. We look forward to continuing to support this effort and working to make Oregon's Bicycle and Pedestrian Plan the strongest and most visionary statewide plan for active transportation in the country.

Sincerely,

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