



MEMORANDUM from Planning

Date: February 10, 2016
To: Rich Faith
From: Tom Bouillion
Re: Port of Portland Comments on the Draft Multnomah County Comprehensive Plan and Transportation System Plan

Process

- We encourage greater outreach and coordination with jurisdictions and stakeholders. While the process appears to have robust citizen involvement through the CAC, other interested stakeholders should also be engaged. Examples include:
 - Jurisdictions
 - Portland
 - Troutdale
 - Gresham
 - Fairview
 - Wood Village
 - Standing technical advisory groups
 - MTAC
 - TPAC
 - EMCTC
 - EMEA
 - Other Freight, Business and Economic Development Groups

Scope/General Comments

- The TSP should acknowledge urban transportation facilities owned/operated by Multnomah County within other jurisdictions, given the importance of these facilities to the individual jurisdictions, Multnomah County and the region as a whole. The TSP is the policy framework that will guide the use, maintenance and investment in County transportation infrastructure for the next 20 years. While these facilities may be acknowledged in other jurisdiction's TSP documents, they do not necessarily reflect County policies. Specific areas include:

- Multnomah County Bridges. Multnomah County has developed a 20-year bridge plan including both urban and rural bridges (<https://multco.us/bridgeplan>) which should be reflected in the TSP.
- Urban Pockets of Unincorporated Multnomah County. The Transportation System Plan for the Urban Pockets of Unincorporated Multnomah County (2006) should be updated to reflect 10 years of significant regional growth and incorporated into the TSP.
- Multnomah County roads within other jurisdictions. County roads, particularly in East Multnomah County, provide critical access to individual jurisdictions as well as the County as a whole.
- The TSP should also acknowledge and describe key pieces of transportation infrastructure in rural Multnomah County not owned by Multnomah County such as Highway 30, I-84, The BNSF Railway Columbia River rail bridge, the Union Pacific Railroad Gorge rail line and the Portland & Western rail line parallel to Highway 30
- Plan should acknowledge urban area planning agreements and special policies, if any, related to urban pockets of unincorporated Multnomah County.
- Statewide Planning Goal 15 (Willamette River Greenway) needs to be addressed in its own chapter and the area subject to Goal 15 should be clearly mapped
- Maps throughout the document are barely legible at a half page in size and therefore should be increase to a full page in size.

Specific Comments

- Chapter 1 Introduction and Citizen Involvement
 - Plan Area Generally (page 9 of 16). The last sentence of this section states “This Plan focuses on the rural areas of the County outside the urban growth boundary”. While this may be the focus of the plan, there is still the need to address urban pockets of unincorporated Multnomah County within other jurisdiction’s UGB, as well as County transportation infrastructure within other jurisdictions.
 - Urban Pockets (page 14 of 16). Some urban pockets within the UGB of jurisdictions, such as Pleasant Valley and Springwater, are identified while many other are not. Specifically, West Hayden Island in Portland’s UGB; the area north of TRIP in Troutdale’s UGB; the area near Dunthorpe in Portland’s UGB and the areas in the West Hills near Portland’s UGB should be described and individually shown on a legible map. In addition, the description of Government Island should be clarified to note a number of recreationally-focused public facilities including two boat docks, picnic facilities and outhouses (http://oregonstateparks.org/index.cfm?do=parkPage.dsp_parkPage&parkId=169). In addition, the island is bisected by I-205 (the Glen Jackson Bridge).
- Chapter 2 Land Use

- Under Policy 2.2, describe the different areas subject to urban area planning agreements and summarize the distinctions (if any) between agreements.
- Clarify that maintenance of the river navigation system as proposed in Policy 9.7 below, including moving, removing, placing and grading river sediment are not subject to the Grading and Fill Policies (Policies 2.42-2.44) on page 16 of 18. Further clarify under Policy 2.44 that maintenance of the river navigation system as described above is exempt from Grading and Erosion Control permit requirements, similar to other proposed exemptions.
- Chapter 3 Farm Land
 - Clarify that Exclusive Farm Use Zone Policies (Policies 3.6-3.8) do not apply to submerged lands or the surface of navigable waterbodies, specifically the Columbia and Willamette Rivers.
- Chapter 9 Rural Economy
 - Apparent typo. The last sentence of the first paragraph of this chapter (page 1 of 5) reads: *The vast majority of non-resourced based economic activity in Multnomah County occurs in the urban areas of the County and Multnomah County is not required to prepare an economic opportunities analysis for the rural portions of the County.* We believe that the sentence means to say that the County is not required to prepare an EOA for the urban, rather than the rural portions of the County.
 - Policy 9.7 does a good job of recognizing the importance river transportation to the local and regional economy. The policy could be modified to state: “Recognize the importance of river transportation to the regional transportation system and to the local and state economy ~~and by encourage~~ encouraging the continued maintenance of the river navigation system, and access to, shipping channels in support of the movement of goods. Maintenance of the river navigation system includes maintenance of structures such as navigation aids, river gages and mooring buoys, as well as moving, removing, placing and grading river sediment.”
 - As mentioned above, Policy 9.7 does a good job of acknowledging the importance of river transportation to the local and regional economy. Similar policies should be created to acknowledge the importance of the regional rail and road systems in providing market access to rural Multnomah County. For rail, the Portland & Western rail line paralleling Highway 30 and the Union Pacific rail line through the Columbia River Gorge are most significant to rural Multnomah County. For truck access, US Highway 30 and I-84 are similarly critical truck freight routes.
- Transportation System Plan
 - General Comments

- Goal 3 notes the desire to “Develop a transportation system that supports the rural character of unincorporated Multnomah County”. However, many of the policies seem more relevant to urban transportation facilities.
- As previously mentioned, County transportation facilities within the urban growth boundary should be described. The County’s governance of roads inside the urban growth boundary (UGB) is limited to the public works standards and other powers of the county engineer. The County is dependent on city land use authority to implement their policies associated with development review related conditions of approval inside the UGB. It would be helpful to have this explained in a preamble to the TSP policies. The legal authority for cities implementing county requirements is unclear. Specifically can City land use documents implement county requirements that are not in the road standards? County Road standards may need to be amended to incorporate relevant comprehensive plan standards or city standards.
- Please provide a map or maps of the county owned roads within the UGB and what city has land use authority for the adjacent properties.
- The legal framework for the County implementing urban style policies for county owned roadways inside the urban area should be explained.
- Specific Comments
 - A new policy should be added acknowledging the importance of the Troutdale airport to unincorporated Multnomah County. Currently, County staff (Kate McQuillan) is an active member of the Troutdale Airport Master Plan Project Advisory Committee. The policy should also support the need to safely operate and maintain the airport, and provide compatible land uses, consistent with the Oregon Aviation Planning Rule and Federal Aviation Administration guidance.
 - Policy 1. This policy describes improving the transportation system for all modes of travel, including reducing vehicle miles travelled. Given the forecast population growth in Multnomah County and the region as a whole over the next 20 years, it is not reasonable to assume that vehicle miles traveled can be reduced, at least not in absolute terms. A better goal may be to minimize vehicle miles travelled. Also, what metrics will be used to determine if these goals are being met?
 - Policy 2. This policy expresses the desire to accommodate multiple modes on rural roads but no hierarchy of modes or way to resolve conflicts between modes.
 - Policy 3. This policy expresses the desire to accommodate multiple modes on rural roads through street design standards but no hierarchy of modes or way to resolve conflicts between modes.

- Policy 5. This policy describes regional freight mobility, including exploring alternate routes and modes for freight mobility. It is unclear what is meant by alternate modes for freight mobility. This policy and an associated map could be clarified to identify officially designated freight routes in unincorporated Multnomah County. This policy seems to imply that trucks are a problem rather than a necessity to connect the rural economy to markets. It would be helpful if a policy were added that recognizes the importance of trucks being able to safely and efficiently use the rural road system in support of the rural economy. If the County is concerned about urban commuter or truck traffic using rural roads then it should be explicitly stated, with a differentiation drawn between traffic that supports the rural economy and traffic that is using rural roadways as an alternative to congested urban roadways.
- Policy 10. This policy is described as finding alternative funding sources for County roads. However, few if any of the 12 strategies listed relate to the Policy statement. These strategies seem more appropriate for a best management practices document for road maintenance staff.
- Policy 15. This policy opposes the placement of “...new regional roadways on Multnomah County roads.” Without an example, the intent of the policy is unclear.
- Policy 16. This policy discourages through traffic on “trafficways” within unincorporated Multnomah County. It is unclear what a “trafficway” is. Is it any road or a specific classification of road? Many rural roads serve a through traffic purpose. Also, how does apply to facilities such as I-84 and Highway 30?