

"SWHRL notes a section of the new Pedestrian Design Guide which seems to have relevance for any plans regarding the SW Hoffman/SW Broadway Dr traffic-control repair: B.

5.4.2 Pedestrian/Bicycle Connection. Currently, the only option for those who do not wish to brave crossing SW Broadway Dr at Hoffman is the "Elevator St. Stairs" which begin at 2300 SW Hoffman; these stairs are some 6 stories tall and steep. We note the following language in B. 5.4.2:

*"Where topography is too steep for a path, a staircase may be used. Per ADA requirements, an alternate accessible path must be available and signage identifying that alternate route must be posted.*

There is a strong case to be made that the intersection of Hoffman and Broadway has been PBOT's de facto solution to this situation, but it is unsafe and inadequate as-is, for those who use ADA facilities and those who do not. Again, from B.5.4.2:

*"The alternate accessible path requirement may be met along the existing street network (designs should meet accessibility guidelines to the maximum extent possible)."*

This language obviously has not been formally approved yet, but we note the intent of this language has long precedent; from the June 1998 Pedestrian Design Guide, Section D.

1.1 Attributes of Good Pathways and Stairs:

*"Appropriate Accessibility -- The facility is as accessible as possible, given the constraints of topography. Where full accessibility is not possible, alternate continuous passages are available"* (emphasis ours).

While there are obviously ADA issues up and downstream of this intersection, ANY work on it would seem to require that this consideration be met or at least improved "to the maximum extent possible." And of course, the much-needed work PBOT is doing to improve pedestrian safety in this area means this intersection is a critical connection component and helps meet city rules and Federal guidelines. We understand that much greater issues exist elsewhere in Portland, with many more affected and with grave consequences; however, most of these pedestrian hazard areas are a direct byproduct of poor PBOT choices in the past which prioritized automobile flow over other considerations. It is imperative - and the updated PDG reflects this - that PBOT be mindful of ALL modes of transit when doing work of any kind; even something as simple as placing a sign meant for one mode has implications for others. Surely traffic-control devices meet this threshold, even if not a capital project. It is easier and far cheaper to prevent issues at the start than to fix them later.

PBOT would seem to have few choices here (we are not engineers, and would welcome hearing of other options *before* a decision is made) -

- 1) repair the existing time-based sensor mechanism embedded in Broadway which controls the light, or recreate with modern equipment.
- 2) Install a traditional traffic light, most usefully with a car/bike sensor on HOFFMAN to allow safe exit.
- 3) Remove the light entirely, either leaving Hoffman drivers to Fate or preventing any exit onto SW Broadway in some manner.
- 4) Make the temporary three-way stop signs permanent, paint a crosswalk, and erect appropriate signage.

We do not deny each may have knock-on effects, including the option of repairing to status quo. However, the permanent stop signs solve ALL of the existing hazardous conditions, with the fewest repercussions, and do it for the lowest cost. An extremely dangerous pedestrian crossing is improved for all modes, high speeds on this densely-populated section of SW Broadway Dr

are reduced by the necessity of a full stop, and ADA compliance is bettered, all for the price of a handful of new signs and some paint. Any cost here which fails to produce these improvements is a waste of money, a sunk cost that future staff may find discourages further expenditures on improvement.

We again ask PBOT staff to consider *all* modes, and not simply craft a solution favoring SW Broadway Dr vehicle traffic. PBOT administrators talk a great deal about improving pedestrian safety, and the staff have worked mightily to write new guidelines and regulations... but as they say, the time comes when the rubber must meet the road.