

Exhibit C to Resolution No. 21-5220
2021 Transportation System Management and Operations (TSMO) Strategy
Summary of Comments Received and Recommended Actions
Comments received September 24 through October 25, 2021

DRAFT

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Metro is the federally mandated metropolitan planning organization (MPO) designated by the governor to develop an overall transportation plan and to allocate federal funds for the region.

The Joint Policy Advisory Committee on Transportation (JPACT) is a 17-member committee that provides a forum for elected officials and representatives of agencies involved in transportation to evaluate transportation needs in the region and to make recommendations to the Metro Council. The established decision-making process strives for a well-balanced regional transportation system and involves local elected officials directly in decisions that help the Metro Council develop regional transportation policies, including allocating transportation funds. JPACT serves as the MPO board for the region in a unique partnership that requires joint action with the Metro Council on all MPO decisions.

Project web site: www.oregonmetro.gov/tsmo

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2021 Transportation System Management and Operations (TSMO) Strategy Public Comment Report

The 2021 TSMO Strategy Draft was released for public review from September 24 through October 25, 2021. Comments were received during the public comment period and through the public meetings of the Transportation Policy Alternatives Committee (TPAC) on November 5, 2021 and Joint Policy Advisory Committee on Transportation (JPACT) on November 18, 2021. Stakeholders were encouraged to review the draft document and comment:

- in writing to Metro Planning, 600 NE Grand Ave., Portland, OR 97232 or transportation@oregonmetro.gov
- by phone at 503-797-1750 or TDD 503-797-1804
- Through an online comment survey

Public agencies, advocacy groups and members of the public submitted comments through email, the online comment survey and one video conference call. In total, eight people provided comments. Eleven people participated in the online comment survey and four of those respondents provided substantive comments. Three people submitted comments through email and one community organization representative provided comments on a video conference call with project staff. No comments were received by mail or phone. All comments received are attached to this report.

Notice of the public comment period was provided through Metro News and distributed to members of the Metro transportation committees interested persons list and Metro's Transportation Policy Alternatives Committee (TPAC) interested parties list and TransPort, a subcommittee of TPAC.

Online comment survey summary

The survey participants' answers to the open-ended questions are included in the comment log with responses.

The online comment survey included a multiple choice question that asked: "Which actions should be emphasized? Select your top three. Please comment on your selections." Out of 21 actions include in the 2021 TSMO Strategy, the following actions were selected by survey participants as ones that should be emphasized: Facilitate ground truthing of emerging technologies. (3 respondents), Develop a Mobility on Demand strategy and policy (2 respondents), Manage transportation assets to secure the network (1 respondent), Pilot Origin-Destination data to prioritize TSMO investments (1 respondent), Explore new TSMO data sources (1 respondent), Create a TSMO safety toolbox (1 respondent), and Improve TSMO data availability to aid in traveler decisions and behavior (1 respondent).

Comment log

The following comment log summarizes recommended changes to respond to all substantive comments received during the comment period. New wording is shown in underline; deleted words are crossed out in ~~strikeout~~. Recommended changes will be made to the 2021 TSMO Strategy upon adoption of this Exhibit C by JPACT and Metro Council.

All items in this Exhibit C are recommended for approval by JPACT and the Metro Council.

The first 12 entries in the following comment log were from four people who made substantive

comments using the online comment form. They included optional demographic information that they were comfortable sharing. Two people responded from Portland, one from Beaverton and one from Washougal, Washington (based on Zip Code). Two respondents shared perspectives as “Community member/traveler” and two shared “Transportation professional” perspectives. Age ranges selected included 35-44 and 65-74. Three respondents selected white as their racial or ethnic identity and one preferred not to answer. Household income ranges before taxes were \$50,000 to \$74,999, \$100,000 to \$149,999 or preferred not to answer.

Comment	Chapter or Appendix	Name/Commentator	Affiliation	Date	Method
1	Chapter 3	Survey respondent 1	n/a	10/2/21	Survey
Comment			Response and/or recommended change (changes shown in strikeout and <u>underline</u>)		
Goal “1) Create a transit system that is free to all riders (without regressive taxation).”			Change Chapter 5, Action 10, sub-action 2 to read “Expand low <u>or free</u> fare, or price subsidies, to include MOD and transit for Black, Indigenous, people of color, and people with low incomes.”		

Comment	Chapter or Appendix	Name/Commentator	Affiliation	Date	Method
2	Chapter 3	Survey respondent 1	n/a	10/2/21	Survey
Proposed change identified in comment(changes shown in strikeout and <u>underline</u>)			JPACT recommendations(changes shown in strikeout and <u>underline</u>)		
Add objective “The statistics are CLEAR if you are poor you can't afford to travel. My family takes the train and walks 20-30 min to avoid the cost. This study clearly avoids the issue that the lower incomes peoples earn IN PORTLAND CENTRAL do not cost of provide money to ride even with the 50% off cards. Do the math. If the rides where free we would have more white ridership and loads more short trips made by bus. It would only be a couple years until we saw all the cars off the roads and ridership reflect the population....less people of color killed by cars because they could afford monitored ticket travel. Seriously...rent and food eat more than a low income salary...you can't make it without cheating presently. This report doesn't make that abundantly clear. Free to all cuts cost of all that administration and would create lower skill level jobs that these same people could do cleaning regularly, handing security, etc.”			No change recommended. In Chapter 3, Goal 3, Eliminate Disparities” includes objective 3.4 “Reduce the transportation cost burden experienced by Black, Indigenous, people of color and, people with low incomes.”		

Comment	Chapter or Appendix	Name/Commentator	Affiliation	Date	Method
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3	Appendix Chapter 2	Survey respondent 1	n/a	10/2/21	Survey
Comment			Response and/or recommended change (changes shown in strikeout and <u>underline</u>)		
Comment related to additional TSMO considerations for transportation agencies and decision-makers: "Stop the investment in tech and support the investment in the people."			No change recommended. The Strategy calls for use of the Equity Tree to assess the solution steps to achieving equitable outcomes, evaluating outcomes and being accountable.		

Comment	Chapter or Appendix	Name/Commentator	Affiliation	Date	Method
4	Chapter 3	Survey respondent 1	n/a	10/2/21	Survey
Proposed change identified in comment(changes shown in strikeout and <u>underline</u>)			JPACT recommendations(changes shown in strikeout and <u>underline</u>)		
Comment related to bias: "The bias is thinking that the workers with kids and earning minimum wage can afford the train...so more money put into tech means they continue to be left behind with no sign, no trains at night when there is work (MORE AND MORE WORK NIGHTS AND YOU EARN LESS THAN A 10 MIN UBER RIDE!!!!)...seriously make the train free for all and then add more drivers and trains...we don't need the tech."			The Strategy Chapter 3, Goal 4, Objective 4.4 is to "Increase availability and accessibility of low-cost transportation options for low income individuals and people of color." Recommend change to Chapter 5, Action to Unify and standardize fare subsidies for transit and MOD, sub-action 2 to read "Expand low <u>or free</u> fare, or price subsidies, to include MOD and transit for Black, Indigenous, people of color, and people with low incomes."		

Comment	Chapter or Appendix	Name/Commentator	Affiliation	Date	Method
5	Chapter 3	Survey respondent 2	n/a	10/5/21	Survey
Comment			Response and/or recommended change (changes shown in strikeout and <u>underline</u>)		
Comment related to Vision, Goals and values: "Single occupant vehicles (SOVs) are extremely inefficient in the use of terrestrial space. The more land devoted to accommodate SOVs, the farther apart we push the points of origin and destination for which travel is required - community sprawl. As the distance between points of origin and destination increases, the more miles needed for travel. Traffic congestion is a predictable and expected outcome when the focus on transportation is placed on SOVs to meet travel needs. This focus must be changed. Traffic engineers are primarily trained in designing roadways to maximize traffic flow. All too often their focus is on providing more space, more lanes, to			No change recommended. In Chapter 3, Goal 4, Connected Travel Choices, includes objective 4.1 to "Connect decentralized travel options to facilitate viable destinations in Regional Centers, Town Centers, and employment areas outside downtown Portland." This goal and objective connects TSMO with efficient land use through regional growth policy. Objective 4.2 "Prioritize the completion and expansion of planned transit and active mode networks when investing discretionary revenues especially to destinations with limited travel choices." A performance measure on "system connectivity" will provide a measurement basis with equity context to Goal 4 and related objectives.		

<p>accommodate more traffic. This, along with the points listed above, contributes toward induced demand. Our Department of Transportation insists that they have insufficient funds to maintain existing pavement, and at the same time, they continue to increase lanes and lane widths. Increasing space (lane width, shoulders, medians) for SOVs in order 'improve safety' often results in faster traffic, decreased efficiency in use of space, higher speed accidents and increased fatalities. Traffic congestion in urban areas is not a 'problem to be solved,' but the expected result of over-dependence on SOVs to meet transportation needs. Traffic congestion is a tool that must be used to modify human behavior and realize increased mobility. Increased reliance upon frequent, interconnected, reliable public transportation must be our primary response."</p>	<p>The Strategy also includes an Action to "Create a TSMO Safety Toolbox" to utilize a Safe Systems Approach, actively manage speed, provide guidance and implement technologies to improve safety. TransPort, Subcommittee of TPAC, will continue to meet regularly, providing an open forum among traffic engineers, planners, researchers, consultants, community members and all are welcome.</p>
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Comment	Chapter or Appendix	Name/Commentator	Affiliation	Date	Method
6	Chapter 3	Survey respondent 2	n/a	10/5/21	Survey
Comment		Response and/or recommended change (changes shown in strikeout and <u>underline</u>)			
Comment related to Objectives: "Need to acknowledge that a significant percentage of our population does not have access to, or should not have access to, an automobile. A significant percentage of the population does not have the ability (age/physical/mental/financial/legal limitations) to drive safely - many cannot drive at all. This likely includes over 30% - 40% of the population. To realize "EQUITY," we must acknowledge these points, and reduce focus on accommodating SOVs."		Recommend change to Chapter 3, Goal 4, Objective 4.4 "Increase availability and accessibility of low-cost transportation options for low income individuals and people of color, <u>and in acknowledgement that a significant percentage of people will not have access to an automobile.</u> "			

Comment	Chapter or Appendix	Name/Commentator	Affiliation	Date	Method
7	Chapter 5	Survey respondent 2	n/a	10/5/21	Survey
Comment		Response and/or recommended change (changes shown in strikeout and <u>underline</u>)			
Comment related to current work and urgent need in respondent's community: "The objective of 'intelligent transportation systems' is to provide improved guidance and traffic control of transportation vehicles. (We do not		Goal 6, Objective 6.1 is to "Plan and design a flexible transportation network that can adapt to new technology and travel choices that are consistent with the region's desired land use and transportation outcomes."			

<p>need ‘emerging technologies,’ we need to better utilize, and improve upon, the technologies we already have. Safe, efficient systems have existed for many decades, utilizing hybrid technology and electrical power for energy of motion, and highly efficient, and automated traffic control. We call this technology ‘railways.’ High capacity railways rely on flanged steel wheels rolling effortlessly on steel rails, greatly minimizing energy use, landuse, and a wide range of environmental and health related issues. Rubber tires on pavement require TEN TIMES more energy to overcome rolling friction on level ground. Japan's Shinkansen demonstrates that railway technology can be virtually fail-safe, cost-effective, environmentally sound and efficient. ZERO injury accidents after over 56 years of operation at speeds up to 200 mph.”</p>	<p>Chapter 5 Action, to Facilitate Ground Truthing of Emerging Technologies, starts with a description to “Respond to community-voiced needs to initiate agency partnerships to test emerging technologies.” Recommended change to this action is to add an example to the list: <u>“Collaborate with ODOT Public Transit Division, transit agencies and rail operators to identify technologies for safe, efficient and reliable operations.”</u></p>
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Comment	Chapter or Appendix	Name/Commentator	Affiliation	Date	Method
8	Chapter 5	Survey respondent 2	n/a	10/5/21	Survey
Comment		Response and/or recommended change (changes shown in strikeout and <u>underline</u>)			
<p>Comment related to additional TSMO considerations for transportation agencies and decision-makers: “We need congestion-pricing, NOT tolling. Congestion pricing can help reduce traffic congestion and make the road system operate more efficiently for everyone. Consider program like Vancouver WA is doing - allowing C-Tran buses to drive on shoulder. Congestion pricing revenue could be designed to allow funding for meaningful transportation solutions (not subject to Constitutional restriction). Tolling merely adds more money to the fund used to expand road structure. Current Constitutional limitations on gas tax and registration fees would allow ‘operation’ of the roadways - this could and should include operation of public transportation (buses) - this would also help to address ‘congestion,’ safety, equity and environmental concerns.”</p>		<p>Chapter 5, Action to Develop a Mobility on Demand strategy and policy includes a sub-action to “Evaluate unified payment strategy and related policies, including congestion pricing, as they function to provide demand and system management through MOD, transit and connected travel options.”</p> <p>Under the Action to “Establish a Regional Transit Operators TSMO Group,” recommend change to the sub-action: “Coordinate with TriMet <u>transit operators</u> to identify TSMO solutions to support a bus on shoulder implementation plan, building on lessons learned from I-5/I-205 pilot program.”</p>			

Comment	Chapter or	Name/Commentator	Affiliation	Date	Method
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9	Appendix Chapter 3	Survey respondent 3	Southwest Washington Regional Transportation Council	10/13/21	Survey
Comment			Response and/or recommended change (changes shown in strikeout and <u>underline</u>)		
Change Goal 1 from “free from harm” to “safe.”			No change recommended. Goal 1 is to “Create a transportation system where all users are free from harm.” This goal was crafted by the Stakeholder Advisory Committee along with objectives that include safety.		

Comment	Chapter or Appendix	Name/Commentator	Affiliation	Date	Method
10	Chapter 3	Survey respondent 4	City of Portland	10/22/21	Survey
Proposed change identified in comment(changes shown in strikeout and <u>underline</u>)			JPACT recommendations(changes shown in strikeout and <u>underline</u>)		
Commenting on Goals: “There isn't much in the way of specifics in these goals. High level words are difficult to translate into traffic signal timing parameters and technology choices.”			No change recommended. Metro staff acknowledge that Vision and Goals are at a high level, reflecting regional policies.		

Comment	Chapter or Appendix	Name/Commentator	Affiliation	Date	Method
11	Chapter 3	Survey respondent 4	City of Portland	10/22/21	Survey
Comment			Response and/or recommended change (changes shown in strikeout and <u>underline</u>)		
Commenting on Objectives: “Traffic signal timing updates and changes for people walking. Traffic signal priority for buses. Improved accessibility for people walking.”			<p>Recommend change to Chapter 3, Goal 1 Free From Harm, Objective 1.4 “Ensure people of color and low income individuals can safely access multiple low stress mode choices and routes within the transportation system by improving access to, <u>and accessibility of</u> transit stops, pedestrian, and bicycle facilities.”</p> <p>Recommend change to Goal 2 Regional Partnerships & Collaboration Objective 2.1 “Collaborate to provide consistent travel experiences across jurisdictional boundaries through <u>knowledge-sharing on best approaches to multimodal traffic signal timing</u>, integrated payment and scheduling systems, integrated corridor management, and data sharing between agencies.”</p>		

	Recommend change to Chapter 5 Action “Inventory and manage regional signal and ITS Communication infrastructure” sub-action “Create a regional inventory of traffic signal capabilities by location and operator (e.g., connected to central signal system <u>for traffic signal timing updates</u> , utilizing Next Generation Transit Signal Priority, serving freight, sensing bike and pedestrian movements).”
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The Online Comment form invited survey respondents to select their top 3 Actions. Selections were made as follows:

Survey Respondent 1: Improve TSMO data availability to aide in traveler decisions and behavior.

Survey Respondent 2: (none selected)

Survey Respondent 3:

Develop a Mobility on Demand strategy and policy.

Facilitate ground truthing of emerging technologies.

Explore new TSMO data sources.

Survey Respondent 4:

Manage transportation assets to secure the network.

Facilitate ground truthing of emerging technologies.

Create a TSMO safety toolbox.

Comment	Chapter or Appendix	Name/Commentator	Affiliation	Date	Method
12	Chapter 3	Paul Edgar	n/a	9/29/21	Email
Comment		Response and/or recommended change (changes shown in strikeout and <u>underline</u>)			
Email excerpts: “Portland/Metro Transportation and Transit Systems that were built and justified for high levels of commuters and those needs are now collapsing.” ... “What so many business entities have learned in this pandemic, is a lesson coming from this high level of disruption and loss of revenue, is that they have to change their business model.”		No change recommended. Goal 6, Prepare for Change, Objective 6.1 is to “Plan and design a flexible transportation network that can adapt to new technology and travel choices that are consistent with the region’s desired land use and transportation outcomes.” This and other Objectives of the Strategy respond to disruptions and trends.			

Comment	Chapter or Appendix	Name/Commentator	Affiliation	Date	Method
13	Chapter 5	Paul Edgar	n/a	9/29/21	Email

Comment	Response and/or recommended change (changes shown in strikeout and <u>underline</u>)
Email excerpt: "Option #1, Climate Change and the Marketplace can be addressed by creating a whole new Transit Paradigm, by emulating Uber and Lyft with all new electric mini-buses, picking up and delivering transit riders where they need to go, within a totally automated and flexible Route Management Transit System.."	No change recommended. Chapter 5 includes an action to Develop a Mobility on Demand strategy and policy with a subtask to "Build on existing regional policy conversations in support of mobility partnerships, and technology solutions for last-mile connections." Mobility on Demand includes connections to transit, taxi and transit network companies (e.g., Uber, Lyft, GoGirlRide), among other services. Metro will assist by convening discussions.

Comment	Chapter or Appendix	Name/Commentator	Affiliation	Date	Method
14	Chapter 5	Paul Edgar	n/a	9/29/21	Email
Comment	Response and/or recommended change (changes shown in strikeout and <u>underline</u>)				
Email excerpt: "Option #2, Major Interstate Highway System, I-5, I-205, and I-84 are essential and require the highest priority to address capacity needs, with the elimination of bottlenecks or impediments that impede the flow of traffic."	No change recommended. Chapter 5 includes an action to Implement Integrated Corridor Management and mainstream into corridor planning." Reliability on interstates and highways will be part of the discussion of capacity across a travel shed, along capacity on other facilities and modes.				

Comment	Chapter or Appendix	Name/Commentator	Affiliation	Date	Method
15	Chapter 5	Paul Edgar	n/a	9/29/21	Email
Comment	Response and/or recommended change (changes shown in strikeout and <u>underline</u>)				
Email excerpt: "Option #3, Create more nimble Demand Management Planning of providing the transportation capabilities and capacity where it is needed and justified by the Marketplace."	No change recommended. Chapter 5 includes an action to Develop a Mobility on Demand strategy and policy including a subtask "Evaluate unified payment strategy and related policies, including congestion pricing, as they function to provide demand and system management through MOD, transit and connected travel options."				

Comment	Chapter or Appendix	Name/Commentator	Affiliation	Date	Method
16	Chapter 3	Paul Edgar	n/a	9/29/21	Email
Comment	Response and/or recommended change (changes shown in strikeout and <u>underline</u>)				
Email excerpt: "Option #4, Justification and	No change recommended. Chapter 3 includes				

Priority of Transportation Systems and Investments, needs 'Public By-In', and that requires Voter Approval of Congestion Pricing/Tolling!"	Goal 2, Regional Partnerships & Collaboration, including Objective 2.3 "Collaborate with and educate travelers."
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Comment	Chapter or Appendix	Name/Commentator	Affiliation	Date	Method
17	Chapters 3 and 4	Elizabeth Graser-Lindsey	n/a	10/25/21	Email

Comment	Response and/or recommended change (changes shown in strikeout and <u>underline</u>)
Email excerpt: "...SDCs would be a strong congestion-reduction/demand management tool and they would help with encouraging infill and with discouraging sprawl and its exorbitant costs. Tolls are a poor congestion-reduction/demand management tool because they penalize people for unavoidably using the regional inefficient system of roads connecting sprawling and incomplete communities (e.g. they tax people going to work or not using transit because of last mile considerations and they push some traffic on to surface streets causing more problems) rather than giving them positive options – like compact urban forms -- so they don't need to congest the roads."	No change recommended. In Chapter 3, the Strategy includes a Goal 4 to "Connect all people to the goods, services, and destinations they need through a variety of travel choices." Goal 4, Objective 4.1 is to "Connect decentralized travel options to facilitate viable destinations in regional Centers, Town Centers, and employment areas outside downtown Portland." In Chapter 4, the Strategy includes a performance measure for "How complete and connected the infrastructure system is for each travel mode." These parts of the strategy relate to land use, transportation options and connectivity. Additional elements of the strategy incorporate aspects of costs, affordability and pricing that will be important through the regional policy development on pricing and revenue that is outside the scope of this Strategy.

Comment	Chapter or Appendix	Name/Commentator	Affiliation	Date	Method
18	Chapters 5	Duncan Hwang	Asian Pacific American Network of Oregon	10/18/21	Video Call

Comment	Response and/or recommended change (changes shown in strikeout and <u>underline</u>)
Paraphrased comment: The Action to Establish TSMO performance measures baseline is important. Also important but missing from Actions are the benchmarks or price tags that will establish TSMO Program accountability.	Recommend change to the Action to Establish TSMO performance measures baseline, adding a subtask: " <u>Establish benchmarks, milestones and/or estimate costs for Actions. Complete this as early as possible in the scoping of each Action and communicate this information throughout the life of this Strategy.</u> "

Comment	Chapter or Appendix	Name/Commentator	Affiliation	Date	Method
19	Chapters 5	Duncan Hwang	Asian Pacific	10/18/21	Video Call

			American Network of Oregon		
Comment			Response and/or recommended change (changes shown in strikeout and <u>underline</u>)		
Paraphrased comment: The community represented by, and served by Asian Pacific American Network of Oregon asks several key questions about the transportation system: Am I going to be safe? Can I use and access the transportation service? When changes are made, how will you help people and businesses adapt to new modes, new patterns and new facilities? For example, Division Transit Project serves long-range policies but impacts local businesses during construction and in the configuration that limits turns, removes parking and presents painful changes that would be best supported with recognition and proactive assistance to make the adjustment. This includes identifying solutions for businesses for which a reconfigured right of way disrupts the last 50+ feet of deliveries, creating an ongoing burden.			Recommend change to the Action to Implement Integrated Corridor Management and mainstream into corridor planning, adding a sub-action to <u>“Participate in all phases of a corridor project listening for needs voiced by communities, considering disruptions and proposing TSMO-related solutions where applicable. Keep communication lines open post-project to recognize ongoing burdens and participate in adjustments.”</u>		

Comment	Chapter or Appendix	Name/ Commentator	Affiliation	Date	Method
20	Chapters 5	Duncan Hwang	Asian Pacific American Network of Oregon	10/18/21	Video Call
Comment			Response and/or recommended change (changes shown in strikeout and <u>underline</u>)		
Paraphrased comment: The Action to Develop a Mobility on Demand strategy and policy should include more specifics about how communities can be engaged. The Action currently risks not addressing several key areas of transportation accessibility: digital, banked and linguistic divide (apps and other online services that require devices, data, bank account, English). How does work in this area of TSMO Strategy intersect with regulations?			<p>Recommend change to Develop a Mobility on Demand strategy and policy Action description “Create a Regional Mobility on Demand (MOD) Working Group consisting of agency staff, transportation demand management non-profits (e.g., Transportation Management Associations), private partners, and community based organizations <u>and stakeholders representing and helping to solve accessibility issues common to online services, to:</u>”</p> <p>Recommend change to the fourth sub-action: <u>“Examine regulations for shared mobility.</u> Examine benchmarks set for shared mobility services (such as the PBOT Scooter Policy) by partner agencies and establish regional minimum level of service benchmarks for MOD service in equity focus areas connecting to</p>		

	<p>opportunities, to Black, Indigenous, people of color, and people with low incomes.”</p> <p>Recommend change to the ninth sub-action: “Develop communications with travelers, <u>inclusive of people with app or online-services accessibility needs</u>, to inform more travelers about these choices”</p>
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Comment	Chapter or Appendix	Name/ Commentator	Affiliation	Date	Method
21	Chapters 5	Duncan Hwang	Asian Pacific American Network of Oregon	10/18/21	Video Call
Comment			Response and/or recommended change (changes shown in strikeout and <u>underline</u>)		
Paraphrased comment: The Action to Create a community listening program faces an immediate issue of a lack of capacity in most communities to partner on areas of this Strategy and this Action.			Recommend change to Action to Create a community listening program, adding to the Action description: “ <u>Build capacity at CBOs to share an understanding of this Strategy and to guide partnership</u> . Collaborate with CBOs using a culturally specific model and approach to reach out to non-English speakers or limited-English-proficiency groups.”		

Comment	Chapter or Appendix	Name/ Commentator	Affiliation	Date	Method
22	Chapter 3	John A. Charles, Jr.	Cascade Policy Institute	10/25/21	Email
Comment			Response and/or recommended change (changes shown in strikeout and <u>underline</u>)		
Email excerpts related to growth policy: “Many jurisdictions own and operate transportation facilities with long lists of capital improvement projects that can’t be funded. What is the added value of the TSMO plan?” ... “I’m not aware of any other special service district that takes a no-growth approach to planning.” ... “Municipal water districts plan for adequate supply in response to increased demand; and sewage agencies build costly treatment plants.” ...			No change recommended. The Strategy follows the planning process to implement the 2018 Regional Transportation Plan with supportive strategies such as TSMO. The Strategy updates 2010-2020 TSMO Plan by incorporating the 2018 RTP’s community-prioritized policies on equity, climate, safety and reliability for congestion relief. TSMO is part of Climate Smart Strategy policies at the regional and state level and is part of the Congestion Management Process required at the federal level. The precursor to TSMO were ad-hoc efforts in the 1990s among road and transit operators. Their collaborations grew around shared capabilities to actively manage roads and formalized through agreements and a shared		

<p>“Transportation appears to be the one infrastructure service operating with a no-growth strategy. Under the direction of JPACT, the region has failed to add significant new highway capacity since I-205 opened in 1982. This is not a sustainable vision for a growing region where most daily trips are made in motorized vehicles.</p> <p>While there is nothing wrong with using existing facilities more efficiently, as TSMO aspires to do, the region cannot depend on demand management as the primary response to economic growth.”</p> <p>...</p> <p>“Since TSMO is likely to add no value to the region, I suggest that the plan be euthanized and given a proper burial.”</p>	<p>Intelligent Transportation Systems Architecture. This approach is supported by FHWA Operations for both optimizing operations of roads as well as supporting multimodal approaches such as managing demand during major incidents and events. FHWA also supports approaches to incorporate mobility choice for people to access and share bikes, e-scooters and cars. Transportation demand management followed the model of electric utilities that recognized benefits of a management approach before expanding capacity. Water and sewer systems likely follows a similar approach through conservation.</p>
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Comment	Chapter or Appendix	Name/ Commentator	Affiliation	Date	Method
23	Chapters 3	John A. Charles, Jr.	Cascade Policy Institute	10/25/21	Email
Comment			Response and/or recommended change (changes shown in strikeout and <u>underline</u>)		
<p>Email excerpts related to safety: “Free from harm’ in a policy context has no meaning because governments cannot promise freedom from harm. Everything in life has risks, especially in transportation. Governments cannot stop people from driving under the influence of intoxicants, bicycling at night in dark clothing, texting while jaywalking, or simply losing concentration at the wrong moments. The level of surveillance that would be necessary to actually make us all free from harm would itself create harm through the loss of civil liberties.”</p> <p>...</p> <p>“The proposed measure of showing ‘progress toward meeting the 2035 Vision Zero Goal’ is another meaningless feel-good statement. Reducing the number of crashes is desirable, but Metro’s own reporting shows that ‘Vision Zero’ is unrealistic. In 2019, the five year moving average for the region was 83 deaths. The actual number of deaths was 95, and Vision Zero called for a reduction to 55 deaths.”</p> <p>...</p> <p>“Given that both the City of Portland and Metro</p>			<p>No change recommended. The goal to “Create a transportation system where all users are free from harm” was the desired goal of the Stakeholder Advisory Committee for TSMO to both work toward zero deaths and to look for opportunities to design and operate a system that is responsive to reducing racially motivated assaults.</p>		

are seeing Vision Zero trends moving in the wrong direction, assuming compliance by 2035 is an unreasonable metric. It should be modified or eliminated.”	
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Comment	Chapter or Appendix	Name/ Commentator	Affiliation	Date	Method
24	Chapters 3&5	John A. Charles, Jr.	Cascade Policy Institute	10/25/21	Email
Comment			Response and/or recommended change (changes shown in strikeout and <u>underline</u>)		
<p>Email excerpts related to Connected Travel Choices Goal: “Connected travel choices’ is vaguely relevant, although in the absence of any governmental planning the travel connections would be made anyway by private parties (if transportation markets were allowed to function).”</p> <p>...</p> <p>Email excerpts related to Reliable Travel Choices Goal: “Reliable travel choices’ should be the primary objective of this plan, but JPACT has already demonstrated over a long period of time that it has no interest in reliability. That’s why Metro has never implemented congestion pricing despite studying it for nearly 30 years.”</p> <p>...</p> <p>“Metro could also consider market-based road pricing, such as a revenue-neutral feebate system in which peak hour motorists would be tolled and off-peak drivers would receive rebates. But to my knowledge, of the three congestion pricing studies that are now in public discussion (sponsored by Metro, ODOT and Portland, respectively), none anticipate using tolling for this purpose. All three appear to be arbitrary and punitive.”</p> <p>...</p>			<p>No change recommended. The Action in Chapter 5, to Develop a Mobility on Demand policy and strategy, includes the sub-action to “Evaluate unified payment strategy and related policies, including congestion pricing, as they function to provide demand and system management through MOD, transit and connected travel options.”</p>		

Comment	Chapter or Appendix	Name/ Commentator	Affiliation	Date	Method
25	Chapter 4	John A. Charles, Jr.	Cascade Policy Institute	10/25/21	Email
Comment			Response and/or recommended change (changes shown in strikeout and <u>underline</u>)		
Email excerpts related to VMT Performance			No change recommended. The Strategy		

Measure: “The VMT goal seeks to ‘reduce average vehicle miles traveled per person by 10 percent from 2021.’” ... “Even if a VMT reduction goal was achievable through government intervention, there is no reason for Metro to adopt it. VMT adds value to the regional economy, because there is an economic purpose for every trip.”	includes a VMT performance measure, not a VMT goal.
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Comment	Chapter or Appendix	Name/ Commentator	Affiliation	Date	Method
26	Chapters 3	John A. Charles, Jr.	Cascade Policy Institute	10/25/21	Email
Comment			Response and/or recommended change (changes shown in strikeout and <u>underline</u>)		
<p>Email excerpts related to Eliminate Disparities Goal: “Claims of disproportionate impacts: On page 9, it states that the 2021 TSMO plan seeks ‘to address the disproportionate impacts of the transportation system on Black, Indigenous, people of color, and people with low incomes.’ There is no definition of ‘disproportionate impacts’ here or elsewhere. On pp. 12-13 the plan discusses ‘equity in TSMO’, but relies on some simple descriptive statistics rather than trying to analytically demonstrate that the regional transportation system is inequitable.</p> <p>The ‘TSMO Equity Tree’, on page 14, is complete jibberish and serves no purpose.</p> <p>...</p> <p>“‘Eliminate disparities’ is another phrase that has no meaning.”</p> <p>...</p> <p>“Disproportionate impacts: Metro is obsessed with alleged disproportionate impacts, but sees them as only affecting certain classes of people.”</p> <p>...</p> <p>“‘Disproportionate impacts’ is a very complex topic, with cross-subsidies flowing in many directions. If Metro feels compelled to include it as a feature element of the TSMO plan, then the agency should commit to a thorough study of the subject.”</p>			<p>No change recommended. Metro staff will continue to study disparities and follow the community-prioritized equity policy adopted in the 2018 RTP.</p>		

Comment	Chapter or	Name/	Affiliation	Date	Method
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27	Appendix Chapter 1 & Appendix A	Commentator John A. Charles, Jr.	Cascade Policy Institute	10/25/21	Email
Comment			Response and/or recommended change (changes shown in strikeout and <u>underline</u>)		
Comment on Chapter 1 "...the plan states, "This approach is the core goal of TSMO."			Recommend change to Chapter 1.3 "This approach is the core goal <u>of to</u> TSMO."		
Comment on Appendix A list of 2010 projects: "What is the reader supposed to infer from this list?"			Recommend change to Appendix A table title "2010 TSMO Strategy <u>Planned</u> Projects"		

DRAFT

From: [Summer Blackhorse](#)
To: [Molly Cooney-Mesker](#); [Caleb Winter](#)
Subject: FW: [External sender]Portland/Metro Changing Transportation Paradigm, Please enter my comments into the record for the update to TMSO Strategy
Date: Thursday, September 30, 2021 10:39:41 AM

See below for TSMO comment.

Summer Blackhorse

503-329-8407

Hours: 7:30 a.m. to 4:00 p.m., Monday through Friday

Metro, Program Assistant III
Metropolitan Transportation Improvement Program
Regional Travel Options
Get There, Portland Metro Regional Network Administrator
TransPort & Emerging Technology program support

Due to the impact of COVID-19 I am working remotely. I will respond to your email as soon as possible.

From: Trans System Accounts
Sent: Thursday, September 30, 2021 10:30 AM
To: Malu Wilkinson <Malu.Wilkinson@oregonmetro.gov>; Tom Kloster <Tom.Kloster@oregonmetro.gov>; Ted Leybold <Ted.Leybold@oregonmetro.gov>
Cc: Summer Blackhorse <Summer.Blackhorse@oregonmetro.gov>; Yuliya Lee <Yuliya.Lee@oregonmetro.gov>
Subject: FW: [External sender]Portland/Metro Changing Transportation Paradigm, Please enter my comments into the record for the update to TMSO Strategy

Hello all,
Let me know if comments on this subject need to be forwarded to any other specific persons.
Laura

From: Paul Edgar [<mailto:pauloedgar@q.com>]
Sent: Wednesday, September 29, 2021 12:24 PM
To: Trans System Accounts <transportation@oregonmetro.gov>
Subject: [External sender]Portland/Metro Changing Transportation Paradigm, Please enter my comments into the record for the update to TMSO Strategy

CAUTION: This email originated from an **External source**. Do not open links or attachments unless you know the content is safe.

Paul O. Edgar, Comments to the Portland Metro, Transportation Management System and Operation Strategy

Subject: Portland/Metro's Changing Transportation Paradigm, commuters are not going into inter-city Portland. The future as it plays out, will reflect only half of

commuters same month, commuting into intercity Portland. This is a permanent Paradigm Shift.

The world of old of Estimated Transportation Needs, from before the COVID Pandemic have changed and the "Virtual Office" has become the new norm. Portland/Metro Transportation and Transit Systems that were built and justified for high levels of commuters and those needs are now collapsing.

The most frightening example is TriMet's MAX Light Rail Transit System that has little ridership and this has resulted into staggering reductions in ridership revenues and at the same time ever increasing high operating costs with little use and NO future. The "Transportation Paradigm Change" is happening all over the United States and it is well documented.

A recent review of the needs of the Regional Legal Community for office space in SW Portland, reflects that these entities are entering into a major shift of where their employees will work. What so many business entities have learned in this pandemic, is a lesson coming from this high level of disruption and loss of revenue, is that they have to change their business model. One of the first things is they have had to do is get their Balance Sheets in back into balance. They realize that a majority of the employees that they did not layoff and worked virtually and want to continue working virtually. Decisions have been made, they are relocating staff and moving out of their expensive office towers, to regional and less expensive locations that adapt to what their staff's wants as part of the new Virtual Office World.

In these private discussions, it was stated that these Portland Office Foot-Prints over the next few years, will be pared down to what will be only 10% to 30% of what they were previously. This will of course be dictated by their needs and realities of their clientele. This is happening across the board with large and small businesses and firms and they will no longer have the majority of their employees commute into Portland offices and work spaces in near SW, NW, NE, and SE Portland, unless that is a requirement of their conditions of their employment.

What we are seeing is reflected in commuting ridership on TriMet's Light Rail Transit Systems, which might now only represent only 5% to 8% of Pre-Pandemic ridership, same month to current month from before the Pandemic. Regional outline areas are seeing office space getting snapped up in areas close to where people live and an example that was provided, was Kruse Way.

Roads, Highways and Bridges however are experiencing a return to levels of incidents of travel, close to what was occurring from before the COVID Pandemic.

This brings about real questions on ODOT and Portland/Metro's ability to respond to these "Paradigm Shifts on our Transportation Systems Needs and Priorities and Where to Invest".

1. The Marketplace is telling us that the great, great majority will no long having the need for the proposed SW Corridor TriMet Light Rail Transit Line to Tigard and Tualatin! (
2. The cost to provide "Fixed" TriMet's Light Rail Transit capabilities with limited all sources revenues can no longer justified and sustained.
3. The "Essential Transportation Needs have changed and now need to be Identified" as part of this Major Paradigm Shift in the Marketplace of whats it wants, needs, and will use.

A. Option #1, Climate Change and the Marketplace can be addressed by creating a whole new Transit Paradigm, by **emulating Uber and Lyft with all new electric mini-buses**, picking up and delivering transit riders where they need to go, within a totally automated and flexible Route Management Transit System.

B. Option #2, Major Interstate Highway System, I-5, I-205, and I-84 are essential and require the highest priority to address capacity needs, with the elimination of bottlenecks or impediments that impede the flow of traffic.

C. Option #3, Create more nimble Demand Management Planning of providing the transportation capabilities and capacity where it is needed and justified by the Marketplace.

D. Option #4, Justification and Priority of Transportation Systems and Investments, needs "Public By-In", and that requires Voter Approval of Congestion Pricing/Tolling!

October 25, 2021

Dear Decision Makers on I205 Tolling Project:

The I-205 Tolling Project update for public comment states in its Purpose, "The I-205 Toll Project will use variable-rate tolls on the Abernethy and Tualatin River Bridges to raise revenue to complete the I-205 Improvements Project and manage congestion."

The lack of revenue to complete I-205 Improvement Projects and to prevent regional congestion is an open acknowledgement that the lack of System Development Charges (SDCs) for regional transportation -- highways and freeways -- charged for new regional development is causing harm to the region.

- This harm takes the form of congestion that impacts each trip that residents take such as slowing the trip and making it inefficient wasting residents' time and fuel and likely reducing roadway safety.
- This harm also takes the form of development not covering its costs to the region nor factoring in the cost of transportation into development decision.
- It turns out that **SDCs for regional transportation are a congestion-reduction/demand management tool** (despite AskODOT's assertion to the contrary¹). Therefore **they naturally would encourage compact urban forms, discourage driving and would benefit climate**. When an organization or individual bears the actual cost of their (new development) impacts, they factor

1

Elizabeth Lindsey <eaglsing@gmail.com> Jun 11, 2018, 11:34 AM

Good morning Elizabeth –

Thanks for reaching out to Ask ODOT with your questions about system development charges (SDCs). As you probably know, the funding decisions and mechanisms involved with transportation projects are complex. ODOT is funded in large part by fuel taxes (both state and federal) and often works in partnership with local jurisdictions to complete projects.

You specifically asked whether ODOT has considered funding projects through System Development Charges. The short answer is yes. However, SDCs can only be assessed on new development and the revenues from those charges are only invested in related projects. As SDCs cannot be assessed at a high enough rate to cover 100% of project costs, this leaves a funding gap. Often, if these projects are not included in investment plans (either by the state or another jurisdiction) then these projects (and the SDC funds already generated/committed) sit awaiting additional funding. For myriad reasons, ODOT does not currently assess SDCs or rely on revenues generated therein to maintain our transportation system. In the past, some state facilities have been included in local government SDCs revenues.

You also asked about value pricing as a revenue generation mechanism. As you may know, the Oregon Legislature passed [HB 2017, Keep Oregon Moving](#), during the 2017 legislative session. In that funding package, the Legislature directed ODOT to evaluate different value pricing options both as a congestion-reduction/demand management tool and a revenue generation tool. Consistent with the legislative direction, ODOT is in the process of [evaluating all available options](#), with input from the Policy Advisory Committee and members of the public. If tolls are ever placed on Oregon roadways, it will be after engagement with the public, the [legislature](#), and the [Oregon Transportation Commission](#).

As a final note, value pricing focuses on demand management *and* revenue generation, whereas SDCs aren't an effective roadway management tool.

If you're interested in specific projects in your area or specific details about the value pricing options I'd be happy to talk in more detail, or direct you to the right person. Hope this helps. Please let me know if you have additional questions. Thanks.

Lindsay

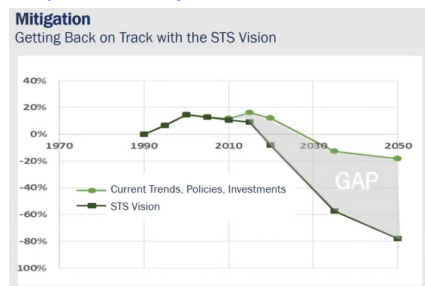
Lindsay Baker
Government Relations Manager
Oregon Department of Transportation
355 Capitol St. NE
Salem, OR 97301
(503) 877-7019 (cell)

those costs into their decision making -- such as whether to develop (or live) close in e.g. near transportation hubs and transit or whether to develop in remote sprawling locations. **System Development Charges for regional transportation could be quite complementary to enacting Vehicle Miles Travelled charges and Vehicle Miles Reduction programs**, that are under consideration. If they were implemented in that way, SDCs would be a strong congestion-reduction/demand management tool and they would help with encouraging infill and with discouraging sprawl and its exorbitant costs.

Tolls are a poor congestion-reduction/demand management tool because they penalize people for unavoidably using the regional inefficient system of roads connecting sprawling and incomplete communities (e.g. they tax people going to work or not using transit because of last mile considerations and they push some traffic on to surface streets causing more problems) rather than giving them positive options – like compact urban forms -- so they don't need to congest the roads.

- ODOT's failure to charge SDCs for regional transportation is the main cause of regional congestion which has built up over many years when regional-transportation SDCs were a potential, but untapped, funding source. While SDCs can't be charged for congestion that predates new development, new development can pay for the congestion it generates as soon as you implement the SDCs. And, as soon as you implement the SDCs, the "funding gap" to correct congestion will stop growing.
- It is much more sensible to penalize the public in such a way that there is an incentive for them to live close to work (through a regional-transportation SDC that the developer would tend to pass on to the home buyer) than to enable the public to cheaply live far from work and service and urban centers (through no ODOT SDC) and then penalize the entire public (through new tolls) for the sprawling transportation needed to service the sprawling development.
- It is unreasonable for the long-time transportation system users to have to subsidize new development that overcrowded the roadway system in recent years/decades. Tolls are essentially a new development subsidy paid by the general public. Development should pay its own way, not pass its costs on to the general public.
- Using tolls to do what SDCs should have done and still could do causes cynicism in much of the public and damages the good will that we need to solve serious problems such as climate change.
- Furthermore, **subsidizing new development through tolls puts ODOT further from decreasing transportation greenhouse gas emissions,**

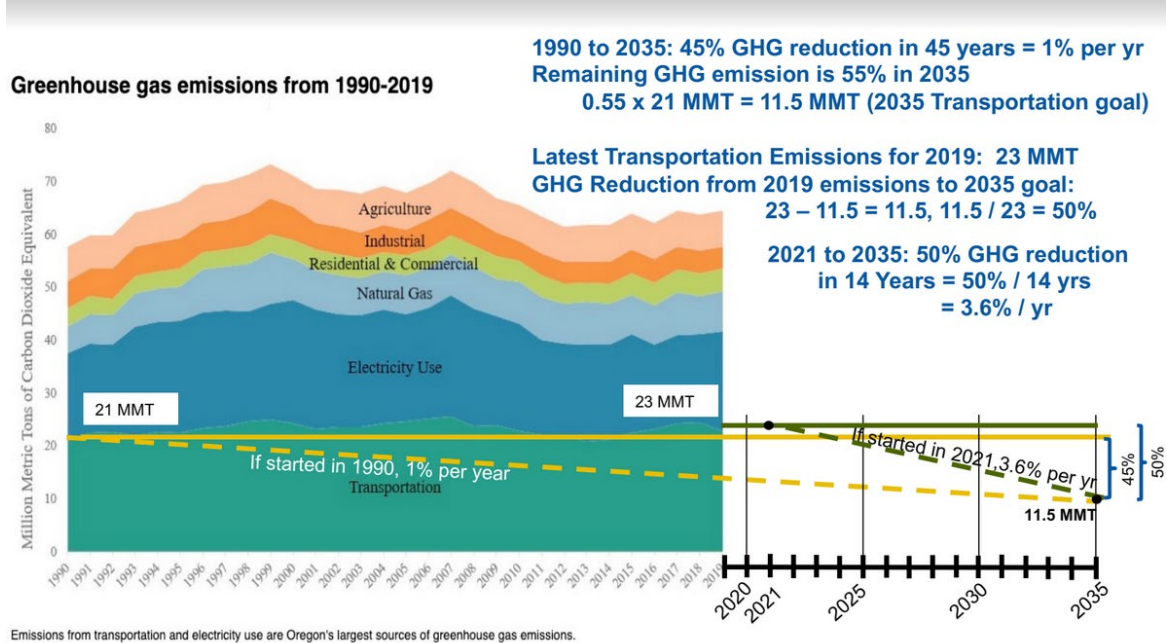
<https://www.youtube.com/watch?v=JwV6SevgC3k&feature=youtu.be> 6:00/57:57)



The GAP is the failure to meet the emission reduction

target.

because we see (elsewhere in ODOT data) that per capita emissions have leveled off or reduced and it's the encouraging of population growth (new development) that keeps Oregon's transportation greenhouse gas emissions from taking the trajectory that the legislature and governor have legally-given.



Datasource: <https://www.oregon.gov/deq/aq/programs/Pages/GHG-Inventory.aspx>

- And subsidizing new development through tolls puts ODOT further from complying with Statewide Planning Goals 12² and 14³ that direct transportation plans and development to stay within the carrying capacity of the air which the GHG emission goals indicate has been surpassed.

Please responsibly address Oregon's transportation funding gap and failure to reach GHG emission goals through System Development Charges rather than tolls.

Sincerely,

Elizabeth Graser-Lindsey
 Beavercreek, OR 97004

² Statewide Planning Goal 12 – Transportation A6. “Plans providing for a transportation system should consider as a major determinant the carrying capacity of the air, land and water resources of the planning area. The land conservation and development actions provided for by such plans should not exceed the carrying capacity of such resources.”

³ Statewide Planning Goal 14 -- Urbanization A3. “Plans providing for the transition from rural to urban land use should take into consideration as to a major determinant the carrying capacity of the air, land and water resources of the planning area. The land conservation and development actions provided for by such plans should not exceed the carrying capacity of such resources.”

TO: Metro Transportation Planning Department

FM: John A. Charles, Jr.

RE: Comments on Metro's draft TSMO Plan

DT: October 25, 2021

My name is John A. Charles, Jr., and I am President and CEO of Cascade Policy Institute, a non-partisan policy research organization. I have been involved in regional transportation planning for over 40 years, and have served on many advisory groups related to transportation and air quality, including:

- Portland Air Quality Advisory Committee, DEQ;
- Traffic Relief Options Study CAC, Metro;
- Oregon Road User Fee Task Force, ODOT;
- Portland Future Focus Steering Committee, Portland;
- Central City Transportation Management Plan CAC, Portland; and
- HB 2179 Task Force to Reduce Air Pollution in the Portland Region (Gov. Roberts).

I have reviewed the draft TSMO plan and offer the following comments:

Purpose: It's not clear why this plan is necessary. Every jurisdiction in the region is already burdened with transportation planning regulations, programs, and projects. Many jurisdictions own and operate transportation facilities with long lists of capital improvement projects that can't be funded. What is the added value of the TSMO plan?

Definition: On page 5, the narrative includes the following phrase: "TSMO strategies provide alternatives to chasing capacity growth..." This is reinforced in more direct language on page 6, under the subheading of **Transportation Planning Rule (TPR)**. In that section, the plan states, "This approach is the core goal of TSMO."

The clear implication of these statements is that adding capacity is a mindless and wasteful endeavor that provides no net benefits to the region. This is incorrect. Healthy regions grow, and it's the responsibility of government to provide related infrastructure including roads, bridges, schools, parks, waste disposal and drinking water.

I'm not aware of any other special service district that takes a no-growth approach to planning. School districts construct and operate new facilities to accommodate growing student populations; they don't simply reject students or encourage parents to stop having children. Municipal water districts plan for adequate supply in response to increased demand; and sewage agencies build costly treatment plants.

Metro itself has sought and received close to a billion dollars of bonding authority to pay for undeveloped land perceived to be necessary for the park needs of a growing metropolitan region. While the execution of that program has been poor, with most Metro parklands not accessible to the public or even located within the Metro borders, the Metro Council has been aggressive in seeking public funding to “chase capacity growth” for future nature parks.

Transportation appears to be the one infrastructure service operating with a no-growth strategy. Under the direction of JPACT, the region has failed to add significant new highway capacity since I-205 opened in 1982. This is not a sustainable vision for a growing region where most daily trips are made in motorized vehicles.

While there is nothing wrong with using existing facilities more efficiently, as TSMO aspires to do, the region cannot depend on demand management as the primary response to economic growth.

Claims of disproportionate impacts: On page 9, it states that the 2021 TSMO plan seeks “to address the disproportionate impacts of the transportation system on Black, Indigenous, people of color, and people with low incomes.” There is no definition of “disproportionate impacts” here or elsewhere. On pp. 12-13 the plan discusses “equity in TSMO”, but relies on some simple descriptive statistics rather than trying to analytically demonstrate that the regional transportation system is inequitable.

The “TSMO Equity Tree”, on page 14, is complete jibberish and serves no purpose.

Objectives: At least four of the six objectives are useless. “*Free from harm*” in a policy context has no meaning because governments cannot promise freedom from harm. Everything in life has risks, especially in transportation. Governments cannot stop people from driving under the influence of intoxicants, bicycling at night in dark clothing, texting while jaywalking, or simply losing concentration at the wrong moments. The level of surveillance that would be necessary to actually make us all free from harm would itself create harm through the loss of civil liberties.

“*Regional partnerships*” is a redundant objective because everything in the region is already taking place through multiple partnerships. “*Eliminate disparities*” is another phrase that has no meaning. Disparities exist everywhere for many reasons. Policies and programs such as the TriMet payroll tax, transportation SDCs, urban renewal construction, and road diets create cross-subsidies and disparate outcomes. Metro is not in a position to ensure equal outcomes for everyone under all circumstances.

“*Connected travel choices*” is vaguely relevant, although in the absence of any governmental planning the travel connections would be made anyway by private parties (if transportation markets were allowed to function).

“Reliable travel choices” should be the primary objective of this plan, but JPACT has already demonstrated over a long period of time that it has no interest in reliability. That’s why Metro has never implemented congestion pricing despite studying it for nearly 30 years. It’s also why Metro prohibited any new Willamette River Bridge capacity south of the Sellwood Bridge, despite finding a need for it in 1999. And it’s why we still have only two interstate bridge crossings over the Columbia River, despite a clear need for at least four.

From Metro’s standpoint, lack of reliability is **a feature, not a bug**, so including it in the TSMO plan is gratuitous.

“Prepare for change” is something that every service provider should assume, but again Metro has spent decades using regulation and taxation to lock in the current infrastructure while avoiding important new investments – aside from the buildout of the 19th century regional rail system, which is the opposite of “planning for change.”

Performance measures: In the event that anyone ever tries to measure the success of this TSMO plan – as unlikely as that sounds – the performance measures will be unhelpful. The VMT goal seeks to **“reduce average vehicle miles traveled per person by 10 percent from 2021.”** How could Metro possibly propose this goal, when the entire point of the TPR was to reduce VMT per capita and it failed miserably?

Specifically, the TPR mandated for Metro and other MPOs that VMT per capita be reduced by 10% over 20 years, and 20% over 30 years. It was adopted in 1991. Here we are 30 years later, the TPR accomplished nothing at great cost, and now Metro wants to try it again without even stating a proposed time period for completion.

Even if a VMT reduction goal was achievable through government intervention, there is no reason for Metro to adopt it. VMT **adds value** to the regional economy, because there is an economic purpose for every trip. People don’t just randomly drive around for no reason, with the possible exception of teenagers on a Saturday night. If elected officials were to succeed in suppressing VMT through taxation or regulation, the economy would suffer and people would consider themselves worse off.

VMT may drop for other reasons, such as a permanent increase in remote working as a result of the pandemic. In that case, it would not harm the regional economy.

Metro could also consider market-based road pricing, such as a revenue-neutral feebate system in which peak hour motorists would be tolled and off-peak drivers would receive rebates. But to my knowledge, of the three congestion pricing studies that are now in public discussion (sponsored by Metro, ODOT and Portland, respectively), none anticipate using tolling for this purpose. All three appear to be arbitrary and punitive.

The proposed measure of showing **“progress toward meeting the 2035 Vision Zero Goal”** is another meaningless feel-good statement. Reducing the number of crashes is desirable, but

Metro's own reporting shows that "Vision Zero" is unrealistic. In 2019, the five year moving average for the region was 83 deaths. The actual number of deaths was 95, and Vision Zero called for a reduction to 55 deaths.

As local economist Joe Cortright wrote in a May 2021 critique of Vision Zero:

Metro tracks 25 separate measures of system safety...Metro's annual report shows that the region is on-track to make exactly none of these 25 objectives...

Given that both the City of Portland and Metro are seeing Vision Zero trends moving in the wrong direction, assuming compliance by 2035 is an unreasonable metric. It should be modified or eliminated.

Appendix A: "TSMO strategy projects": The first page includes phantom projects, such as "Congestion pricing/HOT lanes" and "rideshare services and employer services", at a total cost of \$148 million. The second page lists 23 projects at total cost of \$437 million. This appendix is useless for analytical purposes. Is everything in the region TSMO? Were these projects evaluated for effectiveness? What is the reader supposed to infer from this list?

General comments

Disproportionate impacts: Metro is obsessed with alleged disproportionate impacts, but sees them as only affecting certain classes of people. A more nuanced assessment would consider other types of equity concerns, including:

- The fairness of TriMet's regional payroll tax, which taxes many people for the benefit of the few, in a transit system that has been losing ridership since 2012 despite a vast increase in taxpayer funding.
- The adverse effects of eminent domain used to seize private property in areas other than North Portland, including all light rail projects (built or planned), and interstate highways throughout the region.
- Costs imposed on property owners through LID assessments in neighborhoods along the Portland streetcar.
- Construction of the aerial tram, which imposed both real and intangible costs on affluent property owners in the Corbett-Terwilliger-Lair Hill neighborhood.
- Distributional effects of the STFF employee transit tax enacted by the legislature in 2017.

- Distributional effects of the many road diets and traffic calming projects that have been imposed on the region over the past 25 years.

“Disproportionate impacts” is a very complex topic, with cross-subsidies flowing in many directions. If Metro feels compelled to include it as a feature element of the TSMO plan, then the agency should commit to a thorough study of the subject.

Learning from history: Earlier in these comments, I criticized Metro for ignoring the TPR experience. Note that comments of this nature have been made many times before, by people with far more knowledge of Metro programs than I have. In particular, the Metro Auditor has been a relentless critic of Metro Transportation Planning for more than a decade. Relevant excerpts from Auditor Reports are listed below.

August 2008: Transit-Oriented Development Program: Improve Transparency and Oversight

- *“The Program had **no system for regularly monitoring project results** in terms of increased density, reduction in vehicle miles traveled or new private development stimulated by its efforts. Consequently, it is difficult for the Program to demonstrate its effectiveness.”*

February 2010: Tracking Transportation Project Outcomes

- *“We found that Metro’s processes to plan transportation projects in the region were linear when they should have been circular. After a plan was adopted, the update process began anew with **little or no reflection about the effectiveness of the previous plan** or the results of the performance measures they contained.”*
- *“Systems to collect data and measure progress towards these outcomes were **not in place.**”*
- *“Metro relied almost entirely on **modeled data to estimate the impact of the regional transportation plan rather than on actual data.**”*

November 2010: Transit-Oriented Development Program: Audit Follow-up

- *“Three **recommendations [from 2008] were not implemented:** Develop a regular report that shows a comparison of projects in terms of the results they achieve; develop a method for tracking and reporting complete project costs by project; and develop procedures to monitor projects after they are completed.”*

June 2013: Tracking Transportation Project Outcomes

- *“We found that **recommendations made in a 2010 audit had not been implemented.**”*

- *“The audit found the Planning Department was not organized or equipped to measure progress toward those outcomes.”*
- *“The Planning Department should adjust plans and programs as needed **based on actual quantitative and qualitative data.**”*

These critiques should be considered in refining the TSMO plan.

Conclusion

Local governments and private transportation operators already have dozens of federal, state, and regional mandates, taxes, programs and projects to consider and/or manage. The draft TSMO plan is long on words and short on value. The “equity tree” perfectly symbolizes the circular reasoning associated with this plan.

Since TSMO is likely to add no value to the region, I suggest that the plan be euthanized and given a proper burial.