

October 20, 2020

Robert Van Brocklin, Chair  
Oregon Transportation Commission  
355 Capitol Street, NE  
Salem, Oregon 97301

RE: 2024-2027 State Transportation Improvement Program (STIP)

Dear Chair Van Brocklin and members of the Oregon Transportation Commission:

The members of the Metro Council and the Joint Policy Advisory Committee on Transportation (JPACT) appreciate the opportunity to provide comment on the development of the 2024-2027 State Transportation Improvement Program (STIP) and the thorough approach the Oregon Transportation Commission (OTC) and the Oregon Department of Transportation (ODOT) have taken to the current STIP process. As the metropolitan planning organization (MPO) for the Portland region, Metro is tasked with cooperatively developing the federal transportation investments in our region with ODOT and our transit agencies. Given our role, we understand the challenging discussion the Commission faces to decide how best to invest limited dollars to achieve multiple goals; we also understand the impact that funding decisions have on the state's ability to meet performance metrics, achieve policy goals, and improve the lives of Oregonians. Within this first phase of developing the 2024-2027 STIP, the Commission will make several significant policy decisions which will set the course in how investments in the transportation system will get identified, prioritized, and selected. In making these decisions, we respectfully ask the Commission to consider the following comments.

***Continue a transparent decision-making process for developing the 2024-2027 STIP by allowing time for adequate consideration of stakeholders' recommendations for this important decision.***

The region wants to thank the Commission for beginning the development of the 2024-2027 STIP in a transparent way. Due to the process so far, the region is aware of the different policy goals and approaches which will guide the development of the 2024-2027 STIP. The Portland region welcomes the new outcomes-based performance evaluation that will allow a deeper understanding of the impacts of funding scenarios on achieving the Commission's policy goals. However, our understanding is that the results of this new performance evaluation will not be released and shared with different stakeholder groups until late October. JPACT and the Metro Council are concerned that our stakeholders will not have enough time to review the analysis results and provide comment prior to the scheduled Commission decision on the funding scenarios in early December. We ask the Commission to allow stakeholders the time to consider this analysis, organize comments, and develop recommendations to the OTC before making a decision on the final scenario. This may mean deferring the decision to the January 2021 OTC meeting.

***Provide direction to the 2024-2027 STIP to allow ODOT to address the comprehensive needs of arterials in the Portland region.***

JPACT and the Metro Council are fully aware that transportation resources are limited and scarce, especially during this time; however, the needs in the Portland region are great. A long-neglected area of need are the state-owned arterials. These facilities in the greater Portland area have significant deterioration and are the sites of the greatest number of crashes leading to fatalities and serious injuries. They also play a critical role in the state and region's transportation system, carrying upwards of 30,000 vehicles per day, serving as the routes for some of the state's busiest bus lines, and serving as the de facto main streets for many of the region's communities of color and ethnic small businesses. They are also in greatest need of multi-modal improvements that can achieve state climate targets.

These state-owned arterials in the Portland region require a large combination of fix-it, enhance highway, safety, and non-highway investments but the current STIP funding process creates barriers to adequately addressing these needs. To address these barriers, we ask the OTC to consider changes in the STIP process regarding project eligibility and prioritization criteria within its funding allocation programs and/or to create a dedicated and adequately resourced arterial funding program. Proposed changes to the existing funding allocation programs include:

- Greater emphasis on traffic volume and facility complexity in prioritizing fix-it funding distributions
- Increasing the proportion of revenue allocations to the Safety, Non-Highway, and Enhance programs (as an alternative to creating a dedicated arterial program)
- More flexibility in funding allocation program criteria to allow consolidating project priorities across programs
- Greater emphasis within ODOT regions on coordinating projects across ODOT funding programs and leveraging outside funding sources
- Greater emphasis on arterials in the prioritization criteria within ODOT funding programs, and in some cases, recognition of where funding would facilitate a mutually-beneficial jurisdictional transfer of ODOT facilities to interested local jurisdictions.

The metropolitan region has identified enormous need for these facilities to be improved. If we address these needs together, it is clear that doing so would have a significant impact on our ability to achieve shared regional and state policy goals, as identified in the Commission's Strategic Action Plan. To demonstrate our commitment, Metro has placed a funding measure on the ballot that, if approved, will bring billions of dollars of investment to these facilities and prime them for future federal funding opportunities that will bring new transportation dollars to the state. We have also initiated, in partnership with ODOT, the technical and policy work to facilitate jurisdictional transfer of ODOT facilities to local ownership, should the resources and necessary agency commitment to achieve these agreements follow. ODOT has acknowledge the immense need on these facilities, and investing in them is critical to meeting that state's racial equity, Vision Zero, and climate goals. This is the opportunity to update the STIP process to allow ODOT the funding and administrative flexibility necessary to address the needs on these state-owned arterials.

***Continue to develop and invest in the highway system in the Portland Region in a manner that reflects community values and public input.***

The shared values of the OTC and the region should be the framework which ODOT continues to develop and implement the existing project commitments identified by HB2017; the I-5 Rose Quarter, I-205, and Highway 217 projects. Since 2017, JPACT and the Metro Council have expressed to the OTC and the Oregon Legislature their ongoing support for these projects as part of a comprehensive strategy to address congestion in the Portland region, including a congestion pricing strategy. We request that ODOT continue to develop and fund these major travel corridors with project elements that achieve our shared goals of equity, safety, climate emissions reduction and congestion relief. Investment in ODOT's existing HB2017 commitments need to be done in tandem with investment in the state-owned arterials to ensure the transportation system not only serves the people who live and work in the region, but also supports the livelihood of all Oregonians who depend on an efficient, well managed, multimodal transportation system in the Portland metropolitan region to receive and get goods to market.

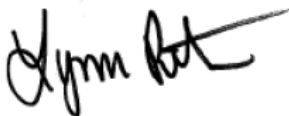
In closing, the Commission has a number of difficult choices to make to which will set the course of direction for the 2024-2027 STIP. To have a STIP prepared by 2023 that is a reflection of the Commission values, we urge the Commission to delay the decision on the 2024-2027 STIP until the January 2021 meeting to allow stakeholders the time to digest the evaluation results, coordinate with the Region 1 ACT and other stakeholder groups, and provide the Commission feedback that helps identify potential solutions to the challenging decisions the Commission faces. The intentional deliberation early in the STIP development process will bear outcomes that provide mutual benefits to the state and local communities.

On behalf of the Portland metropolitan region, JPACT and the Metro Council, we appreciate the opportunity to comment on the 2024-2027 STIP development. The region looks forward to working in partnership with the Commission to best address and advance our shared goals.

Sincerely,



Shirley Craddick, Councilor, Metro Council  
Chair of the Joint Policy Advisory Committee on Transportation (JPACT)  
On behalf JPACT



Lynn Peterson, President, Metro Council  
On behalf of Metro Council

Cc: Kris Strickler