

April 30, 2020

Kris Strickler, Director
Oregon Department of Transportation
Transportation Building
Salem, OR 97301

RE: RECOMMENDATIONS FOR CARRYING OUT EXECUTIVE ORDER 20-04 FOR
IMPLEMENTATION OF THE STATEWIDE TRANSPORTATION STRATEGY

Director Strickler:

Governor Brown's Executive Order (20-04) issued on March 10th directs ODOT and other state agencies to report to the Governor by May 15th on “proposed actions within the agencies’ statutory authority to reduce GHG emissions and mitigate climate change impacts” and by June 30th on “implementation of directives set forth” in certain paragraphs of the Executive Order for ODOT, the OTC, and three other agencies to take to meet GHG reduction goals and implement the Statewide Transportation Strategy.

Action to mitigate the impacts of climate change is urgent and necessary, and strongly lends itself to economic revitalization of Oregon communities as we recover from the covid-19 pandemic, providing convenient, affordable and sustainable access to jobs, education, and other services and resources across our state. We strongly support the creation of the new Climate Office in ODOT, and encourage the agency to implement the Executive Order as immediately and fully as possible. This letter outlines actions that ODOT should include in its reports to the Governor. This is our first round of comments; we look forward to continued conversation.

ODOT needs to immediately pursue major changes to agency plans, policies and practices to implement the STS and help achieve state GHG reduction goals

Immediate action to redirect planning and investments is critical because existing efforts, especially in metropolitan areas, are taking Oregon in the wrong direction: transportation plans are generally not addressing GHG reduction and proposed investments will do little to reduce emissions. We not only know that we need to do things differently in metropolitan areas, the STS tells us *how* they need to change: we need to substantially expand transportation options (transit, walking and biking) and support compact, mixed-use development to reduce the amount of driving people need to do. In short, implementing the STS and achieving our GHG goals requires a fundamental shift in the way Oregon meets transportation needs in metropolitan areas - from our current approach that emphasizes roadway expansion and SOV travel, to a new approach that promotes compact mixed use development and a range of safe, affordable, accessible transportation options - walking, cycling, transit, ridesharing.

ODOT - as the state's transportation agency and the manager of state highways in urban areas - has a key role to play in leading and supporting work with local and regional partners to

accomplish this transformation. However, ODOT has provided minimal support for these changes and policy guidance to implement the STS is ambivalent. Despite the fact that the STS was formally adopted by the Commission almost 18 months ago, there has been no discernible change in ODOT's plans, policies, practices or priorities. Without stronger direction from the Director and the OTC, business-as-usual will continue and metropolitan areas will make little or no progress in planning for emissions reductions or implementing the STS. The costs of continued delay and inaction are enormous.

The massive economic impacts of the covid-19 pandemic call for urgent action to invest in projects that create a lot of jobs and solve real problems in communities, particularly those that have benefited the least and been burdened the most by past investments. Thoughtful, strong implementation of the STS has the potential to meet these needs.

Recommended Actions for STS Implementation

ODOT's May report to the Governor should include the following actions to redirect and expand the agency's efforts to address transportation needs in metropolitan areas.

1. Adopt a OTC Policy Statement directing ODOT to implement and incorporate the STS into its ongoing work.

Despite the fact that the STS was adopted more than a year ago, little progress has been made in incorporating STS into ODOT policies, programs and plans. The Commission should adopt a policy statement that authorizes, directs and encourages ODOT staff to begin implementing STS as the agency conducts its planning work, especially with metropolitan areas. This policy statement is critical, because without it, ODOT staff - as well as the agency's partners and stakeholders - will continue with business-as-usual, awaiting formal changes to agency plans, policies and procedures before addressing this issue.

2. Adopt interim STS Performance Measures to guide state and metropolitan planning

State and metropolitan planning are guided by a series of performance measures, which are adopted by the OTC and included in the Oregon Transportation Plan (OTP). ODOT should move quickly, on an interim basis, to adopt performance measures and targets to implement key actions called for in the STS. Key outcomes and actions include: GHG reduction, VMT reduction, expanding public transit service, increasing the mode share for biking and walking, promoting housing and employment in walkable mixed use centers and neighborhoods, and expanding incentives for the use of transportation options.

3. Redirect and expand technical and financial assistance in metropolitan areas to implement the STS.

ODOT currently provides substantial technical and financial assistance to metropolitan areas to develop and update long-range plans, which are not now tied to GHG reduction targets. ODOT should review all its existing planning projects and assistance and, where feasible,

redirect assistance to help metropolitan areas expand transportation options as called for in the STS. Further, any new funding and technical assistance to metropolitan areas should be tied explicitly to STS implementation.

4. Make implementation of the STS the top priority in ODOT's updated investment strategy.

The department is currently scoping an update of the agency's 2017 Investment Strategy. You should direct that STS implementation be a core element of this update. In metropolitan areas the investment strategy should emphasize funding projects that support compact, mixed use development and transportation options, focusing on investments that support increasing transportation options (walking, bicycling, transit).

5. Make STS Implementation the State's top priority for any federal stimulus program.

In the next few months the federal government will almost certainly be adopting a stimulus program that includes significant new funding for transportation projects. You should direct ODOT staff to begin work now to develop and give priority to developing and funding projects that support implementation of the STS, especially for pedestrian and bicycle improvements, and expanding frequent transit service in areas planned for compact, mixed use development. Available information shows such projects can be done more quickly and are more effective at creating employment opportunities than large roadway projects.

6. Incorporate STS Implementation into the 2021-2024 STIP by allocating funding for STS implementation and by creating an STS leverage allocation.

The department should incorporate GHG reduction and STS implementation into its review and analysis of highway expansion projects in metropolitan areas projects proposed for the STIP. This should include: (1) updating the department's analysis methods to reflect available evidence which shows that highway expansion projects in metropolitan areas are ineffective in reducing congestion or emissions because they induce additional travel and (2) give priority to solutions that promote alternative modes and reduced vehicle miles of travel (VMT).

7. Work with the Department of Administrative Services (DAS) and other state agencies to put in place a model transportation options incentives programs for state employees.

ODOT and other state agencies can model best practices by establishing a transportation options incentives program for agency employees with strong economic incentives for commuting by alternative modes, like the program used by Oregon Health Sciences University that pays workers for each commute trip they make by walking, cycling or transit.

8. Revise the Immediate Opportunity Fund (IOF) program to require benefiting firms to provide transportation options incentives programs. The IOF program provides funding

for roadway improvements that are needed to attract or retain businesses to the state. The state should use this assistance to leverage commitments from firms seeking this assistance to provide transportation options incentives for their employees.

Sincerely,



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Better Eugene/Springfield Transportation
Climate Solutions
Community Cycling Center
Douglas County Global Warming Coalition
Environment Oregon
Farmers' Union Inc.
Friends of Linn County
Friends of Marion County
Friends of Polk County

OLCV Metro Climate Action Team
Oregon Coast Alliance
Oregon League of Conservation Voters
Renew Oregon
Rogue Action
Rural Oregon Climate Political Action
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The Environmental Center
Thrive Hood River