



Metro Council
600 NE Grand Avenue
Portland, OR 97232

August 3, 2018

Dear President Hughes and Metro Councilors,

Thank you for the opportunity to comment on the draft 2018 Regional Transportation Plan (RTP), and many thanks also to the Metro staff who have worked tirelessly on this update for several years. Through this RTP update process, we as a region have identified and prioritized the right goals and outcomes that we need to have a thriving, livable, affordable region for everyone, and have generated a number of complementary plans to guide us there, including Climate Smart Communities, the Regional Active Transportation Plan, and Metro's Racial Equity Strategy.

Our high-level assessment of the draft 2018 RTP is that the region is planning to spend too much of our scarce transportation dollars on building roads and highways, and it is detrimental to our regional goals. Despite or perhaps because of ongoing regional population growth, we should not be expanding highways nor increasing roadway capacity for private vehicles; it is antithetical to our regional goals of improving racial equity, reducing emissions, and improving safety and livability. Excluding maintenance and operations of the transportation system, more than half of the expected funding in the region will go toward supporting increased vehicle capacity – and increased congestion – on highways, roads, and bridges. Five of eight “major projects” in the RTP are primarily highway expansion projects. Regionally, we have a limited vision for improving the transit network and capacity to help more of the region's residents to access and use transit in a way that can reasonably get us where we need to go. Despite several hundred walking and bicycling projects proposed for the next 20 years, in this RTP we will not even achieve 100% completion of our regional Active Transportation Network.

This plan definitely is not the best we can do.

Up to 15% of morning traffic can be attributed to school drop off by private vehicles, but this has been shown to be successfully addressed through robust and comprehensive Safe Routes to School programs – and we are thrilled that Metro has decided to invest in a regional program, but that's only a small piece of the puzzle. There are numerous and well-documented ways to move people more efficiently and affordably than accommodating drive-alone vehicle capacity, but our regional blueprint does not fully embrace this vision; furthermore, the urgent need to lead with racial equity and to address significant safety concerns, especially for people traveling by foot, is not obvious in this draft. Instead, we must shift immediately and region-wide to prioritize the needs of historically marginalized communities by spending more on transit, active transportation, and other projects that reduce disparities in affordability for people of color, and focus



on addressing congestion and achieving all of our regional goals by getting people out of their cars throughout the greater Portland region.

It is essential that we emphasize investments in transit, biking, and walking in the first ten years. Additionally, we suggest changes to the draft RTP that include leading with racial equity, prioritizing safety in projects, making greater gains on the Climate Smart Strategy, and taking a serious look at the health impacts of transportation in our region.

Lead with Racial Equity

For the first time in this RTP, Metro conducted a transportation equity evaluation to look at how well the region's planned transportation investments achieve the transportation priorities expressed by historically marginalized communities, and ensure the investments are not further disproportionately impacting those communities. We are pleased to see that access to transit achieves the desired direction through this plan, including subsequent access to jobs and other community places, and especially for historically marginalized communities. Unfortunately, it appears this is not enough to make an impact on affordability for the region, and the plan states "the region needs to make big strides to reduce disparities in affordability for people of color".

When we lead with equity, we ensure that all people who live, work and recreate in the greater Portland region have the opportunity to share in and help define a thriving, livable, and prosperous place. Equity is the best model for economic growth, and this RTP, through years of planning and agreement on how we will create an equitable and prosperous transportation system, now must ensure we build our region's transportation system on a foundation of social equity.

- Now is the time to invest in the work necessary to ensure implementation of this RTP will reduce disparities for historically marginalized communities, rather than simply documenting today's disparities and waiting for the next RTP update to find out what impact projects from this 2018 RTP had on these communities. Metro should allocate additional staff time and funding, if necessary, to ensure this will occur.

Prioritize Safety in Projects

We are delighted to see this RTP includes a strategy to achieve Vision Zero in the greater Portland region, aiming to eliminate traffic deaths and serious injuries by 2035. In order to achieve this goal, we must target and prioritize a majority, if not all investments to address safety on the region's arterial and throughways. Furthermore, the expected regional population growth will undoubtedly increase the number of trips taken on our roadways, which will translate into a need for a greater focus on the safety needs of people using the transportation system – especially those who walk, bike, and access transit.



- All projects on the High Injury Corridors and Intersections should be reviewed to ensure they meet the region's Vision Zero goals, and specifically to ensure that these project list “reducing fatal and serious crashes” as their #1 priority.
- Complete 100% of the gaps in the regional active transportation network. We strongly support the initial focus of this work being on the high injury corridors that are in historically marginalized communities.

Make Greater Gains on the Climate Smart Strategy

We are already feeling the effects of this climate pollution on our environment. It is promising to see the plan will positively impact climate change, air quality, the environment, and public health. This appears to be largely due to the expected transit service expansions brought about by HB 2017. Nevertheless, cars and trucks continue to emit nearly 40% of Oregon's climate pollution and more than one-half of Oregon's air pollution. With the massive population growth expected in the region, we must not be expanding freeways nor increasing capacity for people driving alone.

- As a blueprint, this plan should confirm Metro's role as climate leaders and work to reduce drive alone capacity through project implementation.
- Expand transit capital and operations to meet or exceed service levels adopted in the Climate Smart Strategy, including significant and early support for “enhanced transit” to ensure additional service will not get stuck in existing roadway congestion.
- We strongly urge Metro to remove from the constrained and strategic project lists, all highway expansion projects that exist to increase capacity, including those that seek to do so via the addition of “auxiliary lanes”. These projects go against the Climate Smart Strategy, and will also make it immensely more difficult to achieve other regional goals for equity, safety, air quality, and health. As per Metro's policy to explore capacity reducing alternatives prior to roadway expansion, there are other strategies in the RTP, such as congestion pricing, aggressive transit expansion investment, and completing 100% of the gaps in the regional active transportation network, that should be implemented first.

Take a Serious Look at the Health Impacts of Transportation in our Region

Cars and trucks emit nearly 40% of Oregon's climate pollution and more than one-half of Oregon's air pollution. It is perhaps lucky for our health outcomes, that at this time the transportation system is being disrupted by the introduction of electric vehicles. The impact on our health due to improved air quality will be immense, especially for youth, older adults, and those in historically marginalized communities who live closer to busier roadways and tend to feel the negative effects of emissions particulates more acutely. Nevertheless, the improvements seen by electric vehicles will have no impact on the amount of physical



activity people in the region get because of reliance on private vehicles and existing safety barriers, nor the negative quality of life impacts that congestion and traffic crashes has on us, both in and out of a vehicle.

We find it quite disturbing that injury crashes were not analyzed in this RTP due to lack of data, despite the fact that “unintentional injuries were the fourth leading cause of death in the 3-county area from 2012-2016”. The subsequent note that “including traffic crashes could therefore substantially alter estimates of health impacts from the RTP” is an understatement of tragic proportions, and we are disappointed that a greater analysis of the health impacts of transportation by serious injury could not be anticipated in this RTP. We strongly suggest that this lack of hard evidence be balanced by the plethora of observed evidence that traffic safety is a major health concern in our region, and urge Metro to take action to prioritize projects that address this growing crisis.

- Two of the most demonstrably effective ways to reduce crashes is to reduce speed limits and reduce the number of miles people travel in a private vehicle. These solutions are thankfully included in the new Regional Transportation Safety Strategy, but certainly could benefit from increased and dedicated funding to prioritize and implement projects in the region.

Perhaps because we as a region are not proposing *big enough* strides, we are not reaching our regional goals with this RTP – including freight delay, which will see immense increases in delay. We are deeply concerned that the elements of the plan that support highway widening over dedicated freight and transit lanes, meeting our Climate Smart Strategy goals, and a complete build out of the Active Transportation Network, will directly result in our failure to meet our regional goals.

Finally, we know we must secure adequate funding for transportation investments. It is clear that local agencies in the region need more resources to achieve the transportation system we need to keep this region a great place, and ensure it is a great place for everyone. The difficult balance, as demonstrated in this draft 2018 RTP, will be to ensure additional funding is put toward transportation projects that truly move us toward our regional goals, rather than being distracted by costly and ineffective road and highway widening projects that keep us stuck in traffic.

Thank you for your consideration of these comments.

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