



February 15, 2022

sent via OTCAdmin@odot.oregon.gov

Oregon Transportation Commission
355 Capitol Street NE, MS 11
Salem, OR 97301-3871

RE: Infrastructure Investment and Jobs Act (IIJA) – Create and move forward with a more progressive, active transportation-focused spending scenario; and Prioritize funding for Climate-Friendly and Equitable Communities Rulemaking implementation

Dear Oregon Transportation Commissioners:

Thank you for seeking public input on how to best allocate federal funds available to Oregon via the Infrastructure Investment and Jobs Act (IIJA). 1000 Friends of Oregon, Bend Bikes, Better Eugene-Springfield Transportation (BEST), Central Oregon LandWatch, Oregon Environmental Council, The Environmental Center, and the individuals listed below work collectively—and often collaboratively—with one another and throughout our state’s communities to help create a more inclusive, safe, vibrant, sustainable future for Oregon.

Our organizations and the tens of thousands of Oregonians and community members we represent want to see these critical IIJA resources allocated in ways that best catalyze and support Oregon’s local communities in becoming more equitable, healthy and climate-resilient places.

Therefore, we urge you to prioritize IIJA funding for: 1) A more progressive spending scenario that more explicitly prioritizes people who walk, bike, roll, and take transit, as well as climate and equity considerations; and 2) Climate-Friendly and Equitable Communities rulemaking implementation, with a primary focus on updates of Transportation System Plans (TSPs) and planning and designating Climate-Friendly Areas (CFAs).

In funding these critical and transformative projects, OTC’s leadership will help ensure Oregon’s communities are safe, just and thriving places now and for generations to come.

1. **A more progressive, responsive spending scenario that meets this moment**

We would like to see a more progressive spending scenario that more explicitly prioritizes people who walk, bike, roll, and take transit, as well as climate and equity considerations.

We want OTC and ODOT to craft and move forward with a spending scenario that allocates funds to active transportation in addition to – and separate from – the Safe Routes to School funding, Great Streets, inter- and intra-city transit, as well as the funding buckets already identified for local climate planning, overdue ADA required improvements, federal ODOT grant matching, and business and development. None of the funds should be allocated to the “enhance highway” category, as these investments do not directly support climate and equity outcomes. Furthermore, highway-focused infrastructure and improvements already have substantial resources allocated elsewhere in the IIJA.

2. **Climate-Friendly & Equitable Communities (CFEC) rule implementation**

Our organizations have been deeply engaged in the Climate-Friendly and Equitable Communities rulemaking process - that implements ODOT’s Statewide Transportation Strategy (STS) - in support of the stated goal that this effort “transforms Oregon’s communities to be safe, equitable, sociable, and pleasant places where driving is not required, and the amount of driving is reduced.”

We must ensure timely and transformative outcomes happen that profoundly alter how Oregon’s communities are built and how state transportation dollars get spent - and by doing so tackle climate change in real, tangible and urgently needed ways.

To do this, local governments need resources to meet the ambitious and absolutely essential goals that the CFEC rules will establish. It’s encouraging that DLCD and ODOT are in close coordination and that ODOT and OTC are considering IIJA funding scenarios that earmark \$15 million for local climate planning and CFEC rule implementation. **We strongly support this - and recommend increasing funding to \$20 million, clearly earmarking a majority of this funding for Transportation System Plan updates (TSP) and planning and designating Climate Friendly Areas (CFAs), and tying compliance and implementation of the CFEC rules to receipt of this funding.**

In their February 3 meeting, Director Strickler suggested to the Land Conservation and Development Commission that CFA planning work might not be eligible for federal funding. However, we strongly encourage you to consult further with agency partners to better understand what limitations, if any, would apply to federal funding

of CFA studies and plans. For 25 years, ODOT and DLCDC have used federal funds for Transportation and Growth Management (TGM) grants to support Category 2 grants for "Integrated Land Use and Transportation Planning," precisely the work CFEC rules will direct local governments to conduct. In addition, we note that the Bipartisan Infrastructure Bill includes new provisions that further clarify and expand guidance to metropolitan areas to integrate housing planning into the metropolitan transportation planning process. We encourage you to consult further with FHWA as well.

Ultimately, Cities will also need substantial capital funding to build these needed walking, biking, and transit projects in our Oregon communities. Over the five years that IIJA funds are available, OTC and ODOT should continue to prioritize funding projects where CFEC rules have been implemented and those projects that reduce the most VMT and GHG emissions. Funding that is guided by a spending scenario like the one we've outlined in item 1 will help ensure this happens.

Thank you for your service and consideration of these comments. We look forward to continuing to work with you, ODOT, DLCDC and our community to ensure Oregon is taking visionary, necessary and urgent action to help our communities become vibrant, climate-smart, healthy, and inclusive places.

Sincerely,

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