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On behalf of the Safe Routes to School National Partnership, we'd like to thank you for the opportunity to provide comment on the draft Oregon Public Transportation Plan (OPTP). The National Partnership welcomes the much-needed update to the OPTP, which will create a foundation for transportation policy decisions and investments by state and local agencies.

Several of the priorities identified in the OPTP are shared by the National Partnership, including: Promoting Better Health, Increasing Equitable Access, Meeting Environmental Commitments, and Making Travel Safer and Communities More Secure. We are glad to see ODOT taking steps to address these issues, by including specific language in goal statements that will determine future transportation planning and projects.

Equity plays a critical role in our work at the National Partnership. People with lower incomes and people of color are less likely to have access to infrastructure for safe walking and biking, and are disproportionately at risk of being injured or killed in motor vehicle crashes, especially as pedestrians. To turn these inequities around, we are focused on prioritizing and working with communities where investments and policy changes are needed most. The OPTP touches on this under Goal 4: Equity. We respectfully ask for your consideration of the following suggestions which can strengthen the vision, and take these meaningful intentions a step further:

**Policy 4.1: Engage populations recognized as transportation disadvantaged in public transportation service decision making.**

Input from a diverse group of stakeholders was essential to the development of the draft OPTP, and we agree that state and local agencies should also increase community engagement practices. We should expect to see policy-makers and planners looking to the community for input and participation, as policy and investment decisions are made. Policy 4.1, as well as Policy 10.1, address the need for agencies to share information to and solicit feedback from communities who have been marginalized and disadvantaged. However, the OPTP does not appear to include language on the importance of including these communities in leadership roles and advisory committees.

While we agree that making information accessible and gaining feedback are important, we suggest that the OPTP highlights the responsibility of agencies to diversify decision-making bodies. Low-income communities



and communities of color are historically under-represented in leadership positions. This creates an inherently biased approach to setting transportation policies.

**Policy 4.3: Identify disparities, barriers, and needs that impact people’s ability to access and use public transportation.**

The OPTP discusses several determining factors that create disparities for underserved communities. We would strongly suggest that OPTP also incorporate housing issues, including gentrification and displacement, which has increasingly created barriers for access to transportation options.

**Policy 4.5: Integrate equity criteria into funding decisions.**

We suggest that in addition to incorporating equity criteria into funding decisions, that the OPTP encourage agencies to prioritize funding projects that positively impact low-income communities and communities of color.

**Student Transportation:** We are pleased to see reference to the needs of youth to access transit for school and other destinations, for example in Strategy 3.3C, and would like to suggest the OPTP incorporate language to facilitate the state working more closely with ODE and Pupil Transportation to address student needs. A 2016 transportation survey from Representative McKeown’s office indicates that a large number of school districts in Oregon do not currently have afterschool transportation access nor transit service for their districts. It is our hope that with the passage of HB2017 and subsequent STIF funding to address needs, particularly in small and rural communities, inclusion of this sort of partnership into the OPTP would complement student services for to/from school and after-school activities, and allow more students more opportunity to access transit options to get where they need to go.

**Youth & Low-Income Fares:** We appreciate the recognition and inclusion of the need for lower fares to reach youth and low income communities, and will continue to monitor STIF guidance on this topic. We strongly suggest that the OPTP implementation plan includes concrete steps the state and local agencies can take to meet this need.

**Transit Access to Parks & Nature:** We were surprised to find very little reference to transit access to parks and nature in the OPTP. While the plan mentions recreational destinations in strategy 2.2B and Policies 2.3 and 5.1, we believe there is a great opportunity to not only relieve congestion at parks and nature destinations, but also to ensure equitable access for underserved communities at these destinations. Recreation as a destination should warrant a closer look in the plan and in our communities, and the state should build on successes such as the Columbia Gorge Express.

Finally, we’d like to suggest revisiting the responsibilities and roles of agencies in achieving the goals of the OPTP. In Chapter 5: Moving Forward, the OPTP describes some of ODOT’s responsibilities, including: “ODOT



*can* also support local initiatives by contributing to or advising pilot projects in line with state goals or undertaking some tests and pilots itself, *particularly those that affect its areas of responsibility, such as highway and signal design.*" We would ask that ODOT make a stronger, formal commitment to support agencies in achieving the goals identified in the OPTP, by changing the word "*can*" to "*will*," and removing the prioritization of projects that fall under ODOT's areas of responsibility. We believe this will strengthen state and local agencies, and better illustrate Oregon's spirit of collaboration.

Thank you for your thoughtful development of the Oregon Public Transportation Plan, and for your careful consideration of our comments.

Respectfully,

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