



Metro Planning – Jurisdictional Transfer

600 NE Grand Ave

Portland, OR 97232

RE: Jurisdictional Transfer Study

Dear Mr. Mermin:

Thank you for the opportunity to comment on the “Regional Framework for Highway Jurisdictional Transfer Study.” We appreciate the inclusion of our staff on the Project Steering Committee as well as the input and review opportunities provided into developing the methodology and the final report.

The draft Regional Framework for Highway Jurisdictional Transfer report provides a clear methodology to identify state highways appropriate for jurisdictional transfer, including both a technical evaluation and a readiness evaluation that provides input into the candidates currently most promising for jurisdictional transfer. As is noted in the study, the methodology provides a foundation for the snapshot in time identification of the top eleven corridors appropriate for transfer.

Ultimately, the ability to undertake the jurisdictional transfers will require funding. The costing methodology demonstrates the breadth of items that need to be considered when assessing the cost of these projects.

The report mentions the development of funding strategies, but does not include these within the document. ***It is important to recognize that any funding for jurisdictional transfers that comes from the State resources will require reductions in other areas.*** Currently, ODOT has begun the conversation about priorities for the 2023-27 Statewide Transportation Improvement Program (STIP). ***If STIP funding is intended for these projects, we encourage participation in the statewide discussion about STIP priorities so that implications and the trade-offs with other programs can be understood more holistically.*** This is particularly critical for rural areas that depend on STIP funding.

Sincerely,