



Rulemaking Advisory Committee Members
c/o Maggie Charles, STIF Formula Program Coordinator
Oregon Department of Transportation
355 Capitol St. NE, MS11
Salem, OR 97301

October 11, 2021

RE: Comments on STF/STIF Rulemaking Process

Dear Rulemaking Advisory Committee Members:

Thank you for the opportunity to comment on the rulemaking process for the STF/STIF Consolidation.

While we recognize that the purpose of this merger is to increase efficiency and funding reliability for public transportation providers throughout Oregon, we are concerned that the rules as currently drafted undermine the legislative intent of HB2017 to improve or expand public transportation service in Oregon.

The current draft rules and allocation method do not support the need for transit in more rural parts of Oregon. The proposed allocation methods would not allow funds to be distributed to rural agencies based on where residents live, instead allocating funds based on where people work, which favors more urban areas. This reduction hinders rural agencies' ability to expand transportation options and coordinate with other service providers to make much-needed connection between rural communities and urban employment centers.

We ask that you explore a new approach that would provide a workable allocation method that meets the legislative intent of HB2017.

Additionally, it is clear that smaller urban areas of the Tri-County region are in desperate need of last-mile shuttle services to complete connections for residents to access work and critical services. The Regional Coordination Dollars that were carved out for this purpose (\$3M in 19-21 funding cycle) have been used to successfully implement a number of last mile shuttles.

We would like to see the rules adjusted to specifically address the need for increased regional coordination dollars and to have this critical allocation codified within the rule. Without an



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increase in these dollars no additional last-mile shuttle services will be added to the TriCounty area in the foreseeable future.

Thank you for your consideration.

Sincerely,

BCC *or* Chair Smith on Behalf of the Board

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