



City of Portland

March 29, 2017

Representative Caddy McKeown, Chair  
House Committee on Transportation Policy  
900 Court Street NE, HR D  
Salem, Oregon 97301

Dear Chair McKeown and Members of the Committee:

The City of Portland opposes HB 3119 as introduced because the bill preempts state and local authority to ensure safe use of our rights of way, and prematurely authorizes widespread deployment of autonomous vehicles (AVs). Instead, we encourage you to form a workgroup using the five principles below to develop legislative recommendations.

Portland is one of the world's leading cities partnering with the private and university sectors to develop best practices for testing and piloting autonomous, electric, and shared vehicles. AVs have the potential to benefit our communities by reducing crashes, improving first and last mile connections for transit users, and reducing the high cost of owning a private vehicle. AVs also have the potential to significantly increase traffic congestion, vehicle miles travelled, and climate pollution. The protections and rules of the road adopted by state and local governments will substantially determine how much benefit and how much burden we experience.

The City of Portland requests the formation of a workgroup that considers the following five principles to evaluate and shape state AV policy and legislation:

**1. Maintain Authority; Build Partnerships**

Maintain state and local authority to manage the testing and operation of autonomous vehicles in our rights-of-way. We strongly oppose preemption and self-certification as a replacement for registration and reporting. Both would increase risk, decrease transparency, and undermine management by those responsible for managing our rights-of-way. Instead, support and reward partnerships between the public and private sectors and between local, regional, and state transportation agencies.

**2. Phasing**

Phase in authorization to operate autonomous vehicles, starting with allowing testing and piloting a limited number of registered autonomous vehicles before widespread deployment.

### 3. Advance Outcomes

Legislation should clearly prioritize AVs that advance adopted state energy, climate, equity, and congestion policies. Fleet autonomous vehicles that are electric and shared by multiple passengers (captured by the acronym FAVES) is one priority likely to help advance state and local goals. State and local policy should also ensure equitable access to the benefits of AVs.

### 4. Register and Inform

Ensure that AV testing and deployment is transparent while protecting individual privacy and proprietary technologies to both overcome reported public skepticism of AVs and to provide sufficient information to inform right-of-way management.

- Semi-autonomous and fully autonomous vehicles should be pre-registered with state and local agencies.
- Test and pilot boundaries and conditions should be pre-registered and approved by the agencies managing the rights-of-way. The public has a right to know when, where, and how AVs will be tested and piloted.
- AVs should have a visible external display on the vehicle.
- AVs operating in public rights of way should provide state and local governments sufficient vehicle operating information to evaluate safety, congestion, climate, and equity implications.

### 5. Financial Responsibility: User Pays

Investing in connected and autonomous (CAV) infrastructure and software could be very costly to state and local governments. So could evaluating the benefits and impacts of tests and pilots. State and local governments should be able to recover initial and ongoing infrastructure, service, and administrative costs associated with CAVs.

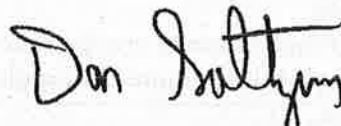
Introduction of AVs also provides an opportunity to reduce congestion. CAV legislation should encourage evaluating congestion pricing to improve reliability and reduce delay. Pricing factors should include location and time of day, Vehicle Miles Travelled (VMT), occupancy, and fuel source (e.g. electric vs. fossil-fuel). Doing so creates incentives to move more people in fewer vehicles, reducing congestion and climate pollution while saving people travel costs.

Developing an appropriate AV legislative framework will take time and collaboration. The City of Portland encourages the formation of a workgroup wherein the Legislature and stakeholders can produce a framework that advances our shared economic, environmental, safety and equity goals.

Regards,



Mayor Ted Wheeler



Transportation Commissioner Dan Saltzman

City of  
**Portland, Oregon**

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April 19, 2017

**TO:** Leah Treat  
Director, Portland Bureau of Transportation

**FROM:** Mayor Ted Wheeler  
Dan Saltzman, Commissioner-in-Charge of Transportation

**RE:** Launching Portland's Smart Autonomous Vehicles Initiative

Portland is one of the world's leading cities partnering with the private and university sectors in developing innovative technology solutions that improve our quality of life. We believe Portland should do this again by developing best practices for testing autonomous vehicles (AVs). Portland can show how to "do AV right" by working with transportation providers and the public to implement testing and piloting of this technology, while advancing public safety, protection of the environment and transportation access for everyone, regardless of income. With the right policies and protections in place, we believe autonomous vehicles should be tested in Portland in 2017.

Autonomous vehicles have the potential to be a truly transformative technology. They could benefit our communities by reducing crashes, improving first and last mile connections for public transit riders, and reducing the high cost of owning a private vehicle. They also have the potential to significantly increase traffic congestion, vehicle miles traveled, and climate pollution. The protections and rules of the road adopted by state and local governments will substantially determine how much benefit and how much burden we experience.

It is also important that cities provide clear leadership as AV technology is tested and piloted before widespread use. AVs operating on city streets with pedestrians, people in wheelchairs, and bicyclists pose different challenges than AVs operating on open stretches of I-5 and I-84. Local streets must continue to be managed by the local agencies which know them best.

In order to ensure that autonomous vehicles work with and for Portlanders, we are directing the Portland Bureau of Transportation (PBOT) to launch the Smart Autonomous Vehicles Initiative (SAVI). This initiative formally invites technology innovators to work with the city to ensure new transportation technologies advance our safety, equity, climate, and job goals.

Portland's SAVI should:

- Spur innovation and guide this emerging transportation technology to serve community goals;
- Show how autonomous vehicles can advance our Vision Zero goal to eliminate all traffic deaths and serious injuries by 2025. AVs must show that they can and will drive at safe speeds and stop for pedestrians, bicyclists, disabled people, emergency vehicles, red light, and stop signs.
- Prioritize fleet autonomous vehicles that are electric and shared. Shared electric autonomous vehicles are most likely to reduce congestion, climate pollution, and travel costs for low and moderate income Portlanders;
- Establish a clear permitting process for public or private sector partners to apply to PBOT to test autonomous vehicles at specific times, in specific locations, in Portland;
- Encourage testing new technologies to benefit low and moderate income Portlanders and high value trips like public transit and freight.

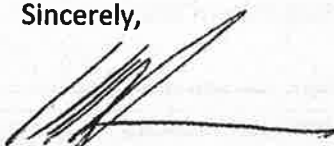
Therefore, we are directing PBOT to take four actions to advance SAVI within the next 60 days:

1. Propose for City Council and public consideration Interim Transportation System Plan (TSP) policies that ensure connected and autonomous vehicles will serve Portland's safety, equity, climate change, and economic goals;
2. Publish a Request for Information (RFI) that invites AV testing specific to advancing safety, equity, climate, and economic goals;
3. Adopt an Interim Administrative Rule that provides a clear path to permit innovators to apply to test, pilot or deploy AVs in Portland; and
4. Develop public engagement, reporting, and evaluation plans that ensure Portland residents, workers, and businesses have opportunities to shape the "rules of the road" for AVs in Portland.

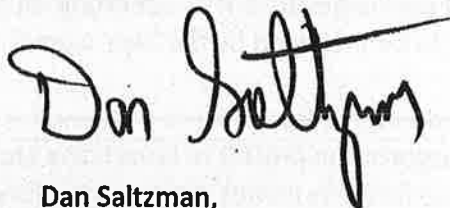
We also recognize the importance of partnering with state, regional, and local authorities to establish a phase-in process to learn from testing autonomous vehicles before widespread deployment. In a letter on March 29, 2017, Portland requested our state legislators use five principles to evaluate and shape state autonomous vehicle legislation. We suggest starting with a state, regional, and local agency work group to evaluate and recommend state autonomous vehicle policies and protections to the 2018 legislature.

We have a choice to be passive and let autonomous vehicles happen to us, or take the initiative and make them work for us. Portland will make AVs work for us.

Sincerely,



Ted Wheeler,  
Mayor



Dan Saltzman,  
Commissioner