April 8, 2015

Re: Oregon Chapter of the American Planning Association Comments on the Draft Target Rule Review Report

The Oregon Chapter of the American Planning Association (OAPA) represents over 800 professional and citizen planners in the state. OAPA has been pleased to participate in several of the advisory groups for the Oregon Sustainable Transportation Initiative, including the Scenario Planning TAC. Thank you for this opportunity to comment on the Draft Target Rule Review Report. Responsible responses to climate change—both mitigation and adaptation—remain a high priority for OAPA.

We enthusiastically support updating Oregon’s greenhouse gas (GHG) reduction targets to incorporate new metropolitan planning organizations (MPOs) and also to reflect new long-term planning horizons. Based on rapidly evolving, uncertain and complex scientific factors as well as emerging technology and fuel standards, we agree that there are compelling reasons for regular review and revision to the GHG reduction targets. In addition to those cited on page 3 of the draft proposal, we would like to add the availability of the US 2010 Census Data, since this information was not available during the development of the original targets.

In December 2014, Metro adopted the Climate Smart Strategy for the Portland metropolitan area. It is a data-driven, evidence-based, well-researched model for scenario planning that we recommend be replicated and adapted in other metropolitan areas throughout Oregon. We strongly advocate that grant and technical assistance resources be made available to MPOs to undertake this important planning and implementation framework. To reach our GHG reduction goals, scenario planning must be integrated with the comprehensive planning guidelines for all MPOs in Oregon.

The Commission has rightfully acknowledged the impact of lightweight vehicles within a metropolitan area that are not attributable to that area. This is especially important as the geographic scope of greenhouse gasses is regional. Unfortunately, the current modeling tools (GreenSTEP and RSPM) are not equipped to take into consideration the GHG emissions of the commuting trips of the entire travelshed. Additional resources should be allocated to ODOT to develop GHG emission model(s) that are capable of analyzing the emissions of the entire travelshed.

In closing, we encourage the Land Conservation and Development Commission to set clear and achievable targets to keep Oregon on track to meet 2050 GHG reduction goals. We know that current targets are achievable only if existing local, regional, and state reduction plans are
funded and implemented. This will require shared, concerted, community-based efforts in partnership with state and federal resources and support.

Please let our Program and Policy Manager Becky Steckler know how we can continue to support your work. Becky can be reached via email at becky@oregonapa.org or by phone at 503.889.6536. Thank you again for your consideration of this most important matter.

Sincerely,

Jason Franklin, AICP
President, Oregon Chapter of the American Planning Association