January 17, 2017

Land Conservation and Development Commission
635 Capitol St NE
Salem, OR 97301-2540

RE: LCDC AGENDA January 27, 2017
Item 13. METROPOLITAN GREENHOUSE GAS REDUCTION TARGETS
Item 14. FUTURE AMENDMENTS METROPOLITAN TRANSPORTATION PLANNING RULES

Dear Chair Macpherson and Commissioners,

The Oregon Chapter of the American Planning Association (OAPA) is a membership-based organization representing more than 850 professional and citizen planners in the state. We appreciate the opportunity to serve on the Advisory Committee on Metropolitan Transportation Planning and Greenhouse Gas Reduction Targets. We also appreciate the process that was coordinated by Commissioner Lidz and the work of the Department of Land Conservation and Development (DLCD) and the Oregon Department of Transportation (ODOT) staff.

METROPOLITAN GREENHOUSE GAS REDUCTION TARGETS
The revised rule and targets provide a strong framework, but we feel they do not go far enough. Both the Oregon Global Warming Commission Roadmap to 2020 and ODOT’s Statewide Transportation Strategy call for measures to reduce greenhouse gas (GHG) emissions from the land use and transportation sector, including actions that address the statutory targets to reduce GHG emissions below 1990 levels by 2050. However, we do not find sufficient commitment in these rules or in associated implementation strategies to achieve those targets.

The climate science is clear and unambiguous. Without significant resources devoted to combating climate change in the next few years, the earth’s overall temperature will continue to increase. We know that each of the last few years has successively been the warmest yet on record. If, as good planners, we trend that out using the best science as our guide, ecosystems and associated economies on which we depend for life as we know it are at the greatest risk.

Therefore, in addition to asking you to adopt these targets and modified rules, we also urge you to participate in solutions that bring expanded financial and technical resources to assist metropolitan regions and their local governments in meeting Oregon’s targets for GHG reduction from the land use and transportation sector. We suggest that specific projects to implement these rules and achieve the targets within Metropolitan Planning Organizations (MPOs) be prioritized in the state transportation budget this biennium. In addition, we strongly recommend that model GHG reduction selection criteria be developed for the Oregon MPO
Consortium and Area Commissions on Transportation (ACTs), and that they be made mandatory in order for each region to receive federal funds.

Accordingly, this rule can, and we believe should, go further by requiring the reductions identified in statute and rule by:

- In line 323 of the draft rule, changing “may” to “shall” to ensure consistent methodologies across planning regions in Oregon.
- In section 660-044-0025 1(b) require that each region of the state, whether through a Metropolitan Planning Organization, Area Commission on Transportation, Council of Government, county or city process, achieve the targets if the state provides the resources to do the necessary planning work.
- Changing “if” to “when” in row 373 and omitting the associated “then” in line 376.
- Defining grams of CO2e as such in Table 1 for clarity of understanding.

We want to reiterate that more than voluntary rules will be required for local governments to help address climate change. They will need the State to support their partnership with local governments through funding and technical resources to achieve these targets. If such resources and strategies are not made available, we recommend a trigger date be set (e.g. 2021) at which time the rules become mandatory and require adopted GHG reduction strategies.

FUTURE AMENDMENTS METROPOLITAN TRANSPORTATION PLANNING RULES

OAPA supports the concepts (12-13-16 Recommendations to LCDC) for future Transportation Planning Rule (TPR) amendments to clarify and integrate federal Regional Transportation Plans with local Transportation System Plans within MPO areas. To produce desired GHG reductions Oregon’s regional and local transportation plans should be seamless, including synchronized schedules for updating regional and local plans. With better alignment of federal Regional Transportation Plans and metropolitan area Transportation Planning Requirements, regions will be more able to efficiently plan and track our GHG reduction progress, and to spend more time increasing transportation choices and implementing the strategies in our plans for better transit, transit oriented development, walking, and bicycling options.

OAPA looks forward to participating, as will our local government members, in this future improvement of Transportation Planning Rules in our metro areas. We thank you for your consideration, your commitment to combatting and helping regions adapt to climate change, and for all that you do.

Sincerely,

Jeanine Rustad, JD
President