September 18, 2018

Jerry Lidz, Chair
Oregon Land Conservation and Development Commission
635 Capitol Street NE, Suite 150
Salem, OR 97301-2540

RE: Comments from the Oregon Chapter of the American Planning Association on
Recommended Proposed Performance Measures for Metropolitan Transportation
Planning OAR 660-012-0105

Dear Chair Lidz and Members of the Commission:

This letter provides comments from the Oregon Chapter of the American Planning Association (Oregon APA) on the proposed rule and performance measures.

Oregon adopted ambitious state goals to reduce greenhouse gas emissions almost ten years ago. After initially making progress, the state has lagged in implementing measures to achieve significant progress toward those goals. Last year the Oregon Global Warming Commission 2017 Biennial Report made the following statement: “Fixing State Climate Policymaking The State’s climate policymaking machinery is not measuring up to the task of achieving GHG reduction goals and preparing the state for the effects of climate change. This failure is especially noteworthy for tasks not being informed by rigorous cost/benefit analysis, guided by agency assignments and benchmarks, and tracked for performance.”

It is imperative that responding to climate change be one of the state’s highest priorities in the next few years. Without major progress in this area now, it will become increasingly difficult for Oregon to achieve the needed, meaningful reduction in GHG emissions in the coming decades.

Oregon APA strongly supports the adoption by LCDC of performance measures that clearly spell out for their partner MPOs and local governments how to align their transportation and land use plans and implementing measures to significantly reduce green house gas emissions.

The critical factor is that these proposed measures be implemented quickly within MPO regions, since progress toward the state’s GHG reduction goal cannot be met without bold action. Technical changes to our transportation and energy sectors alone, while important, will not get us there. Local land use plans and regulations must be brought into alignment as
quickly as possible to help meet this ambitious but critical goal. Since land use and
development changes on the ground happen slowly, these new local plans and programs must
be developed and implemented within the next couple of years to have any hope of affecting
significant GHG reductions within the next 20-30 years. That means the state needs to act
boldly to require and support effective and timely action by local governments.

We realize that ideally it is better to make such performance measures voluntary. However,
since speed is essential, stronger action must be taken by the state to make significant progress
soon. Oregon’s Land Use Planning Program already provides the vehicle for significant land use
actions that will allow Oregon to meet its GHG goals in a more comprehensive way than other
states. However, the State needs to seize the initiative now to work with their local
government and MPO partners to update and implement their transportation and land use
plans.

While we think that it is certainly in the best interest of all of the cities and counties of the state
to act on their own on behalf to do whatever they can to reduce the effects of climate change,
we recognize that because of the urgency involved this effort calls for more financial resources
than many of them can redirect from existing resources. For that reason, we suggest that the
required actions by local governments and MPOs be tied to the allocation of state money for
this purpose. This could either be allocated directly by OTC/ODOT from existing sources or
through action in the upcoming legislative session. The Cap and Invest legislation proposed last
session, or whatever new carbon reduction bill is introduced in 2019, would be a logical source,
as would a potential bill proposing changes to Oregon’s Planning Program or Statewide Goals
requiring jurisdictions to directly address the causes and effects of climate change.

Oregon APA believes the proposed Rule should prioritize regional measures for meeting GHG
targets, with these changes:

- All regions should use their established regional GHG reduction targets as a
  Performance Measure, as proposed in 660-012-105 (6)
- Additional State funding and technical support for MPOs and metropolitan jurisdictions
  should be committed before the effective date(s) for the regional and local analysis that
  the Rule would require.
- The Proposed Rule 660-012-105 (1b) allows metropolitan jurisdictions (local
governments) three options to meet performance measures in their Transportation
System Plan. (1. locally selected performance measures, or 2. local VMT reduction
measure, or 3. regional greenhouse gas reduction targets.) Options 1 and 2 are
important; however, these measures should be used in support of a joint regional GHG
target, Option3, not instead of a regional GHG target.

In this rulemaking and LCDC’s work with other State agencies, Oregon APA urges LCDC to
support a unified State climate change program and address the following questions.

- How are TPR Changes Aligned with Oregon’s Statewide Transportation Strategy (STS) for
  GHG reduction and the actions it recommends at all levels of government? The proposed
LCDC Rule falls short of the STS intent, if tracking regional GHG reduction is just another optional measure. The Transportation Commission has just reaffirmed its commitment to GHG reduction. The OTC amended the Oregon Transportation Plan to include the Statewide Transportation Strategy: A 2050 Vision for Greenhouse Gas Emission Reduction (2013) as statewide policy.  

- **Who is in charge here?** At least 11 Oregon agencies now have some role in climate change policies and programs. Oregon’s piecemeal approach to managing climate change, noted by the Global Warming Commission, is confusing and ineffective.

- **Oregon needs a Lead State Agency on climate change**, like the California Air Resources Board. CARB assures unified state, regional, and local actions on climate change. These actions include regional transportation planning in urban and rural areas (not just MPOs), and transportation funding allocations that support regional GHG targets. LCDC should advocate for a lead Oregon agency to coordinate climate change policy, technical and funding resources that support GHG reduction targets, and assist MPOs, other regional transportation bodies (e.g. ACTs), and local governments.

Given the extremely serious ramifications of not adequately responding to climate change, the importance of LCDC’s action on these proposed performance measures cannot be overstated. Spending a few million dollars now to save countless billions later should be an easy tradeoff for the state to make.

Thank you for the opportunity to comment on these very important measures.

Kirsten Tilleman, President  
Damian Syrnyk, Chair,  
Board of Directors  
Legislative and Policy Affairs Committee