November 28, 2018

Senator Peter Courtney, Co-Chair
Representative Tina Kotek, Co-Chair
Members of the Joint Interim Committee On Carbon Reduction
Oregon State Legislature
900 Court St NE
Salem, OR 97301

jccr.exhibits@oregonlegislature.gov

RE: Cap and Invest Bill Support for Greenhouse Gas (GHG) Reductions in Metropolitan Areas

Dear Co-Chair Courtney and Co-Chair Kotek and Members of the Committee:

The Oregon Chapter of the American Planning Association is a membership organization of over 900 planners from cities, counties, and metropolitan areas across the state. In the continuing absence of federal progress on a price on carbon, we are hopeful that Oregon will join other states in taking significant actions to curb climate emissions and invest in a more sustainable future. We stand ready to help refine and further articulate the concepts we raise in this letter.

Thank you for your years of work on a carbon pricing initiative for Oregon. In the final weeks of crafting a cap and invest bill, we urge your attention on the following refinements for addressing GHG emissions from the transportation sector, responsible for 35% of emissions in Oregon:

- **Implement** work initiated by the 2010 Legislature to reduce GHG emissions from the transportation sector. Oregon’s Statewide Transportation Strategy, adopted by the Oregon Transportation Commission and associated rules adopted by the Land Conservation and Development Commission, were developed to guide the necessary reductions in GHG emissions in the metropolitan regions of Oregon. The Statewide Transportation Strategy vision, if on track, would achieve a 60 percent total reduction in greenhouse gases by 2050. Unfortunately, we are not on track to meet this goal and much more work is needed.

- **Earmark**, rather than enable, planning and implementation **funds** for metropolitan planning organizations (MPOs) to comply with GHG reduction targets. Sixty-five (65%) percent of the state’s population lives in one of the state’s eight metropolitan areas, and these are areas

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2 Oregon Department of Transportation Statewide Transportation Strategy Monitoring Report, 2018.
that are capable of the most significant reductions in GHG emissions\(^3\). We suggest specifically $1M per MPO for scenario planning to achieve their adopted targets every ten years.

- **Ensure Funding Based on Plans.** Require cities and counties within metropolitan areas to adopt a scenario plan consistent with ODOT/DLCD Scenario Planning Guidelines (available at [https://www.oregon.gov/ODOT/Planning/Documents/Oregon-Scenario-Planning-Guidelines.pdf](https://www.oregon.gov/ODOT/Planning/Documents/Oregon-Scenario-Planning-Guidelines.pdf), initiated by ORS 184.893 and 184.899) that identifies land use and transportation strategies to meet their GHG target in order to be eligible for mitigation funds from the cap on carbon. 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.

It is critical that all metropolitan regions in Oregon use their established regional GHG reduction targets as a performance measure against which to build their scenario plans to access implementation funds.

Thank you for the opportunity to comment on this most important initiative.

Kirsten Tilleman, President  
Board of Directors

Damian Syrnyk, Chair  
Legislative and Policy Affairs Committee

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