July 22, 2020

Robin McArthur, Chair, and Katie Pearmine, Vice-chair
Land Conservation and Development Commission
esther.johnson@state.or.us

Re: Testimony on Agenda Items 8, 11, and 12 related to climate change mitigation and adaptation

Dear Chair McArthur, Vice-Chair Pearmine, and Members of the Commission:

The Oregon Chapter of the American Planning Association (OAPA) supports the staff positions regarding those projects that would be provided funding by the Policy Option Packages (POPs) (Item 8), the Climate Change Adaptation Framework project (Item 11) and the Climate Friendly and Equitable Communities Rulemaking project (Item 12).

OAPA believes that it is important that LCDC prioritize actions that reduce greenhouse gas emissions as quickly as possible while helping vulnerable populations and impacted communities adapt to climate change impacts. We believe that doing so requires an emphasis on strategies that use LCDC’s rulemaking and statutory authority to focus on providing direction and help for local government implementation of climate-friendly and equitable land use and transportation practices and policies. It is at the local level where most land use and transportation decisions are made. This has been our consistent message over the past two years of legislative efforts on climate change and our response to Governor Brown’s EO 20-04 (see our testimony for the May LCDC meeting [Exhibit 8] and our June 18 letter to DLCD).

We offer these comments and suggestions on the specific agenda items.

**Item #8.** The four projects that would receive funds in the biennium described in the POPs are critical climate change actions and deserve the support of the Commission. OAPA feels that it is important to acknowledge that resources provided DLCD will not support all the projects that should be prioritized to ensure that the State-wide planning program supports the decision making by local jurisdictions, special purpose districts and State agencies on land uses, infrastructure, transportation, parks, and natural areas that result in climate change mitigation, sequestration, adaptation, and equity.

**Item #11.** OAPA concurs with the overarching actions of leadership, equity, vulnerability, collaboration, and mainstream climate adaptation identified for the Framework. And we concur that it is critical to have a coordinator for the leadership structure as described in Item #8. We would suggest adding to Section E (Adaptation Strategies that Fall within DLCD authority) a strategy of “Support developing information that can be used for updating the State Plan goals related to adaptation (such as for example Goals 5, 6, 7, 8, 11 & 17)”. As OAPA has testified in the past, we feel it is critical that the
Framework plan be used as a means for pivoting to actions as quickly as possible. We look forward to providing comments to the August draft.

**Item 12.** OAPA strongly supports moving forward on and completing the Climate Friendly and Equitable Communities Rulemaking project as quickly as possible in order to reduce GHG emissions emitted by automobiles and small trucks.

Elements for the Rulemaking that we believe are critical include:
- Requiring that regional targets (Chapter 660, section 44) for metropolitan GHG reductions become mandatory with the State providing technical modeling, outreach, and code assistance.
- Expanding to all the metropolitan areas as quickly as possible and emphasizing measurement and enforcement.
- Emphasizing the utilization of known common sense and reasonable strategies rather than expecting communities to engage in expensive and time-consuming scenario planning.
- Using known strategies (such as from the Metro Portland area and the Eugene area) to create walkable communities and job centers facilitated by compact land use in combination with walking, biking, and transit connections.

Without the additional information that staff says will be provided for the September meeting, OAPA has no recommendation on which of the five potential rulemaking phasing options would be best. We are intrigued by Option 5, which would allow early action to reduce GHG emissions and seemingly could keep to the same completion timeline as Option 1.

The proposed RAC membership generally is comprehensive although we recommend that you expand on “Representatives who serve or are members of historically marginalized populations” to be more specific about inclusion of vulnerable populations, impacted communities, and communities experiencing racial inequities. OAPA looks forward to participating as a RAC member.

Our previous commentary encouraged DLCD to ask LCDC to initiate this rulemaking effort during this July meeting as was discussed by LCDC at the May meeting. We are not sure why there is a need to get feedback on phasing options and RAC membership and the like before formal initiation.

**Item #10.** Although we understand that this is not an item that LCDC is taking testimony on, we did want to recognize the strong support expressed for a review of the Statewide Planning Goals to consider climate change adaptation, mitigation, and carbon sequestration. As noted in the staff report “Stakeholders unanimously expressed support for this effort. Multiple individuals articulated this effort as one of the top three critical actions as a response to EO 20-04”. We hope that LCDC will emphasize the importance of moving forward with the project.

OAPA is an independent, statewide, not-for-profit membership organization of over 950 planners from across the state working for cities, counties, special districts, state agencies, tribes, community-based organizations, and private firms. OAPA provides leadership in the development of vital communities by advocating excellence in community planning, promoting education and resident empowerment, and by providing the tools and support necessary to meet the challenges of growth.
and change. OAPA supports sustainable communities working to enhance the quality of life for current and future generations by helping to create and stabilize places that are equitable, healthy, and resilient, and provide ongoing economic, environmental, and social benefits.

Thank you for your time and attention to our testimony.

Sincerely,

Aaron Ray, AICP, President
Board of Directors