

April 30, 2020

Land Conservation and Development Commission
635 Capitol Street NE
Salem OR 97301

RE: Recommendations to Land Conservation & Development Commission for Implementing Governor Brown's Executive Order on Climate Change

Dear Commission Members:

Governor Kate Brown's Executive Order 20-04 "Directing State Agencies to Take Actions to Reduce and Regulate Greenhouse Gas Emissions" includes specific direction for the Land Conservation & Development Commission and the Oregon Transportation Commission to "prioritize implementation" of the two powerful tools these agencies already have authority over to reduce greenhouse gas emission from the state's #1 sector: transportation.

Neither commission or agency needs additional legal authority to act; rather, they need to act with the speed that reflects not only the Executive Order, but that climate change is a crisis. In September 2019, by letter, the Governor directed both agencies to undertake much the same actions as directed in the Executive Order. Yet today - more than 6 months later - there is little evidence of progress other than multi-agency meetings which have not yet produced a public action plan.

LCDC must act now to amend its Transportation Planning Rule (TPR) to require the state's other seven metropolitan area to do what Portland Metro has already done: adopt long range transportation and land use plans that meet state-adopted GHG reduction targets.

The Oregon Legislature set statewide greenhouse gas (GHG) reduction goals in 2007. In 2010, the Legislature directed LCDC to adopt transportation-related GHG emission reduction targets for each of the state's 8 metropolitan areas. LCDC, acting in concert with the Departments of Transportation, Environmental Quality, and Energy, adopted these targets in 2011 and revised them in 2016. That same legislation also directed the Oregon Transportation Commission (OTC) to adopt the Statewide Transportation Strategy to Reduce Greenhouse Gas Emissions (STS), which it completed in 2013 but did not adopt until 2018.

In the years since these actions, except for the Metro Portland region, little has happened to reduce GHG emissions through transportation and land use planning. In fact, indications are that many of our metropolitan areas are backsliding - adopted plans are expected to increase vehicle miles traveled and therefore GHG emissions.

The Governor's Executive Order No. 20-04 is clear. LCDC "shall exercise any and all authority and discretion vested in them to help facilitate Oregon's achievement of the GHG reduction

goals.” The Order goes on: “To the full extent allowed by law, agencies shall prioritize and expedite any processes and procedures, including but not limited to rulemaking ... that could accelerate reductions in GHG emissions. To the full extent allowed by law, agencies shall consider and integrate ... the state’s GHG emissions reduction goals into their budgets, investments and policy making decisions.”

And, the Executive Order directs how to achieve this, including by, among other things, directing LCDC and ODOT to start acting on the Governor’s previous directive letter of September 2019, by “[a]mendments to the Transportation Planning Rule that direct changes to the transportation plans of metropolitan planning areas to meet GHG reduction goals.”

Therefore, pursuant to the Executive Order, the Commission legally can, and should, take actions at its May Commission meeting to immediately initiate rulemaking to amend the Transportation Planning Rule to require metropolitan jurisdictions to meet GHG reduction targets and implement the Statewide Transportation Strategy as they update transportation system plans, through the following steps.

Rulemaking should include:

- A public engagement plan that leads with the communities most impacted by climate change in the state’s urban areas: lower-income communities, communities of color, older persons, the transit-dependent, youth, and those whose health is impacted by climate pollution.
- Interim performance measures and targets that implement key outcomes and strategies in the Statewide Transportation Strategy, including but not limited to:
 - Reducing per capita vehicle miles travelled (VMT)
 - Increasing households and jobs in compact, walkable, mixed-use developments and neighborhoods
 - Significantly increasing affordable housing in walkable, transit-served neighborhoods
 - Increasing transit service
 - Increasing pedestrian and bicycle mode share and improvements
 - Expanding transportation option incentive programs
- Redirection of agency grant funds and technical assistance to help local governments update land use and transportation plans to meet GHG and STS performance measures and targets.
- Additional actions developed through the public engagement process.

Sincerely,

Mary Kyle McCurdy
Deputy Director
1000 Friends of Oregon



Sara Wright
Transportation Program Director
Oregon Environmental Council



350 Eugene
350 Salem Oregon
Better Eugene/Springfield Transportation
Climate Solutions
Community Cycling Center
Douglas County Global Warming Coalition
Environment Oregon
Farmers' Union Inc.
Friends of Linn County
Friends of Marion County
Friends of Polk County

OLCV Metro Climate Action Team
Oregon Coast Alliance
Oregon League of Conservation Voters
Renew Oregon
Rogue Action
Rural Oregon Climate Political Action
Committee (ROCPAC)
Safe Routes Partnership
The Environmental Center
Thrive Hood River