

**Testimony of Metro Councilor Carlotta Collette
Chair, Joint Policy Advisory Committee on Transportation
on behalf of the Metro Council
Before the Land Conservation and Development Commission
April 21, 2011**

Thank you for the opportunity to comment on the Proposed Metropolitan Greenhouse Gas Emission Reduction Targets Rules. **With this letter, I am conveying the Metro Council's support for the proposed rules and 20 percent target for the Portland metropolitan area**, with the understanding that the region will pursue the target with a collaborative process that builds on our ongoing efforts to preserve farm and forest land, create jobs, build healthy communities and provide equitable access to jobs and affordable housing and transportation choices.

I'm proud of the leadership the Commission and the Legislature have shown in establishing the process that led to these proposed rules and Metro's scenario planning effort. It is in this context that I want to encourage the Commission to continue to provide statewide leadership on several aspects of the climate issue with the following comments.

We need a more clearly defined explanation of the target, using real world examples of what it might mean from an individual perspective and community perspective. Translating the rules into an average number of vehicle miles of travel per capita per day and clarifying the assumptions around the fuel efficiency expected of the vehicle fleet will help the community understand what it might take to reach the target. The rule provides an estimate of the region's share of emissions expected to be reduced with land use and transportation strategies, but does not include an estimate of the emissions reductions expected from vehicle technology improvements and cleaner fuels. Without both pieces of information and real world examples of what it might mean, it is difficult to simply explain what the target means for our region.

The draft rule undervalues the effectiveness of land use strategies in reducing emissions. As we develop more healthy communities, where walking, biking and public transit are accessible to meet daily household needs, we also reduce dependence on automobiles. This leads to reduced purchasing of vehicles, and corresponding reduction in emissions related to vehicle manufacturing. The draft rule ignores these embedded emissions from the transportation system. If the fleet and technology assumptions do not come to fruition as quickly as expected, these land use changes may be even more important to reaching our emission reduction goals.

We need to continue to work together to ensure federal and state cooperation in meeting these goals. We need the state to continue to work with our region and our federal delegation and state representatives to ensure federal and state policies help us realize the draft rule's technology assumptions. These assumptions are very aggressive and will require state and federal actions to implement incentives and regulations to be realized. This also means fighting any legislation that would have the effect of undermining environmental protections, reducing public transit funding or slowing the adoption of cleaner fuels and more efficient vehicles.

We need the state to acknowledge that all sectors of our economy contribute to the climate problem, and all need to be part of the solution. This rule only addresses a small part of the overall climate change issue – the emissions from cars, small trucks and SUVs. The state hasn't set targets for emissions from industry, freight and consumer goods consumption. We need targets and efforts to reduce emissions in those sectors as well.

But for now, we recognize the focus is on reducing emissions from cars, small trucks and SUVs. **We have started our search for a regional solution that will build on our existing efforts, local plans and the region's adopted desired outcomes.** The strategies we've used to implement the 2040 Growth Concept to make the metropolitan area a great place to live are among the same tools we'll need to meet the state targets.

We look forward to continued work with the Commission and the Oregon Transportation Commission in developing the Statewide Transportation Strategy. It is important for the Statewide Transportation Strategy to provide timely policy direction on some of the tools that will help our region meet our target – such as interstate and intercity travel, high speed rail, commuting between rural and urban areas of the state and congestion pricing. This will be critical to support the other metropolitan areas in their work as well.

The draft rules ignore the problem of rural-to-urban commuting that puts urban traffic on rural roads, hampering farm operations and promoting long, automobile dependent trips. The draft rules only address travel within metropolitan planning organization boundaries, ignoring traffic in the larger travelsheds that surround and penetrate those boundaries. This commuting not only generates more congestion and emissions in our region, it also has the unintended consequence of adding traffic and urban land uses in agricultural areas. This is a challenge that all six MPOs in Oregon are struggling with in part due to the geographic scope of our respective planning responsibilities. In the Portland metropolitan area, our travelshed extends far beyond our urban growth boundary as you can see on the map attached to my testimony, and includes Clark County in SW Washington.

We need more research on the potential impacts of climate change on rural economies and solutions that rural parts of the state can help implement. So far, the climate discussion focuses on urban impacts and solutions but there are also real economic impacts that could be felt by rural parts of the state that need to be understood (e.g., crop and food production impacts). These areas also need to be part of the solution given that 50 percent of the state's light vehicle carbon emissions come from rural parts of the state. We are all in this together and we all have a role to play at the state, regional and local levels.

We need flexibility and a holistic approach. Page 11 of the draft rule lists a number of factors that should be considered when the Commission reviews the targets in 2015 and beyond. These factors should also be considered during the 2012 rulemaking required by Oregon Laws 2009, chapter 865, section 37(8) and it is critical to continue bringing all the MPOs and other partners to the state table for this dialogue. It is also important for the 2012 rulemaking on preferred scenario selection and implementation to provide flexibility for each region's preferred strategy to reflect local values and approaches, and not just focus achieving the target.

Thank you for providing me with an opportunity to comment. On behalf of the Metro Council and the Joint Policy Advisory Committee on Transportation, I look forward to our continued collaboration with the Commission and your staff as we move forward.

Oregon's Economic Engines

NORTHERN WILLAMETTE VALLEY



For much of its history, Oregon has been a rural state, with an economy centered on the timber, agriculture and mineral industries. Today, Oregon's major urban areas have become the state's economic engines and are increasingly the focus of growth and investment. These vital economic centers are concentrated in three areas of the state:

- Willamette Valley
- Rogue Valley
- Central Oregon

The Northern Willamette Valley includes the Portland and the Salem-Keizer regions, which together make up the largest urban corridor in Oregon. The following includes an overview of the greater Northern Willamette Valley and the issues that face this rapidly growing area.

Unique geography

The Northern Willamette Valley region consists of two large metropolitan areas: the Portland metro area and the Salem-Keizer metro area. The region lies at the confluence of the Columbia and Willamette rivers and is defined by the Coast Range on the west and the Cascade Range on the east. Encompassing two of the five largest population centers in Oregon, the region serves as the state's economic, cultural and political center and is a West Coast hub for trade, commerce and travel. Approximately half of Oregon's agricultural production takes place in the region.



Local history

The earliest permanent American settlement in the Northern Willamette Valley appeared in the 1840s. The arrival of the steamboat in the 1850s initiated travel on the Willamette River south to Eugene and north to Oregon City, facilitating the exchange of mail and the trade of goods and produce. With the advent of the steamboat and expansion of agriculture and logging, by 1850 the Portland area had more than 800 residents, and Salem's population had grown to 2,500. Shortly after Oregon became a state in 1859, voters selected Salem as its capital.

Due to the region's unique location at the confluence of the Willamette and Columbia rivers, the Northern Willamette Valley emerged as a major hub for transportation and trade. The arrival of the Oregon and California Railroad in 1869 continued to foster the region's growth. By the end of the 19th century, the Northern Willamette Valley was home to more than 90,000 residents, and today remains one of the larger urban areas in the Northwest. The growth of the region is projected to reach well over 3 million residents by 2025.

Understanding the region

The regional economy extends across city and county lines as residents commute up and down the Northern Willamette Valley corridor. Average commuting time throughout the Northern Willamette Valley ranges from 21 to 26 minutes.

In Multnomah County, 11 percent of the population uses carpools and another 11 percent takes public transit. This is the highest percentage for these two travel options of any county in the Northern Willamette Valley.

Transportation facts

- According to the 2000 census data on commuting patterns, the four counties in Oregon with the highest rates of inbound and outbound commuters are Multnomah, Washington, Clackamas and Marion.
- Polk and Clackamas counties have the largest share of residents commuting outside the county for work.
- Marion and Clackamas counties exchange about 3 to 4 percent of their respective residents as daily commuters. Similarly, 3 to 4 percent of Marion County residents commute to Washington and Multnomah counties.



Portland Metro

Employment and economy

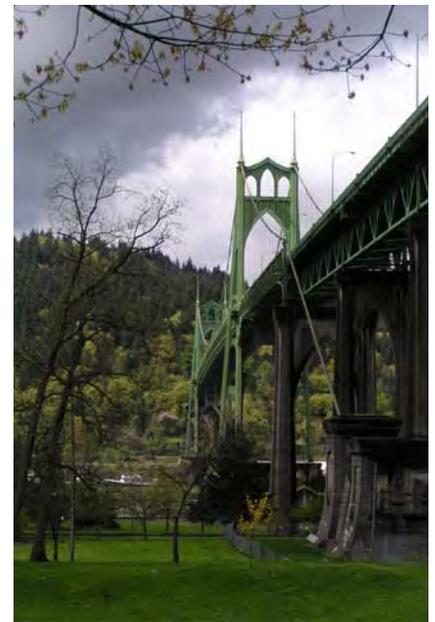
While Portland is Oregon's largest urban area, agriculture remains a significant part of the regional economy, with Clackamas, Multnomah and Washington counties responsible for 17 percent of agricultural production for the state. Clackamas County is second only to Marion County in agricultural sales revenue of specialty products.

The regional economy is built on the area's proximity to gateway facilities and supported by a growing population. The regional port facilities provide 10 percent of all manufacturing jobs in Clark, Multnomah, Washington and Clackamas counties. Three-quarters of manufacturing activity in the Portland metro area fall into the category of durable goods, with computer and electronics manufacturing dominating that category. As the center of Oregon's high-tech industry, the greater Portland metro area accounted for approximately 10 percent of the nation's semiconductor output in 2005. In addition, educational, health and government services have contributed thousands of new jobs to the regional economy, propelled in large part by a growing population.

Looking ahead, the Portland metro area continues to add jobs at a rate that is consistent with the popula-



tion expansion projected for the next 25 years. The professional and business services sector is expected to grow due in part to a dependence on temporary employment. High-wage professional and technical service industries, such as engineering, architecture and computer system design, will continue to see marked growth as well. The continued population growth throughout the metro region will fuel service-based industries such as retail and hospitality as well as educational and health services. Government and public sector jobs will be concentrated in public education, reflecting an expected increase in the school-aged population in growing areas like Washington County.



Salem-Keizer

Employment and economy

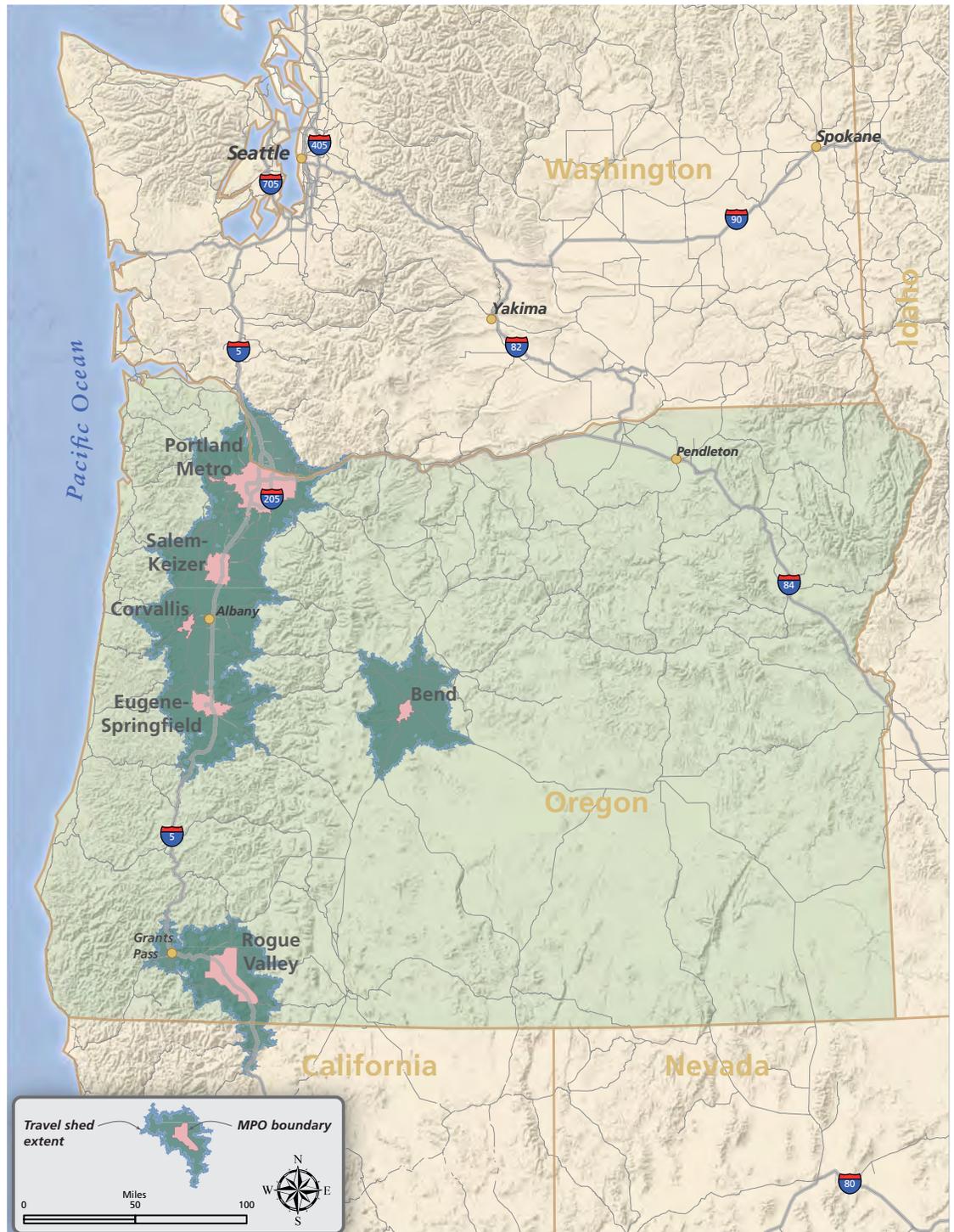
As the state capitol and county seat, employment by the local and state government drives much of Salem's economy, employing 29 percent of the workers in 2000. The retail and service sector is the second largest employment block, with major employers in health care and banking. Education also bolsters the economy due to a prominent university presence. The region contains two public and six private universities.

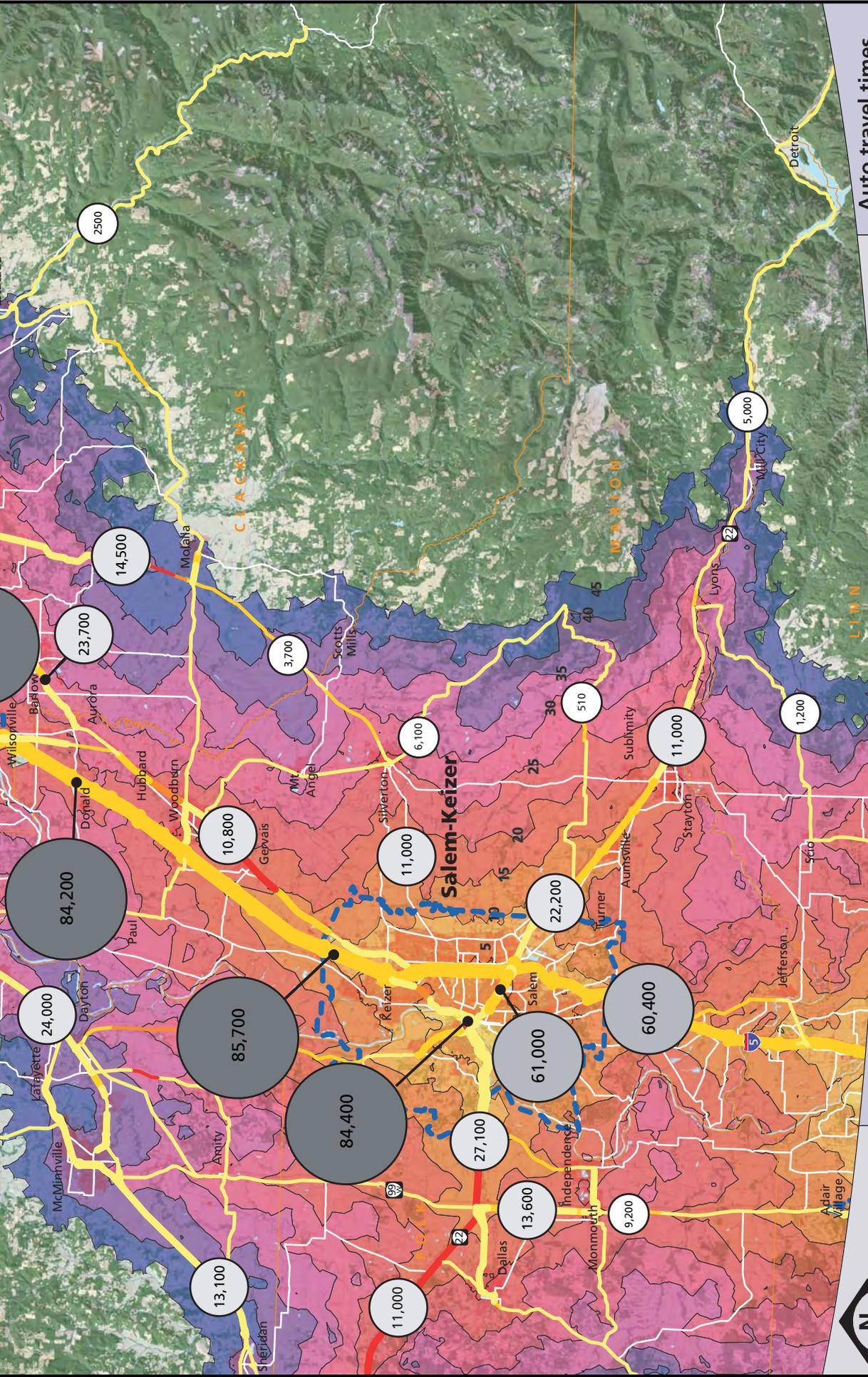
Recent large developments include Keizer Station, the Mill Creek Industrial Park, Salem's downtown Conference Center and multiple mixed-use developments in Salem's downtown core. Surrounded by a rich variety of agricultural lands in Polk and Marion counties, processing and distributing these products plays a significant role in the local economy. Manufacturing still plays a role in the local economy, although recent years have seen the departure and reduction of some manufacturing firms.



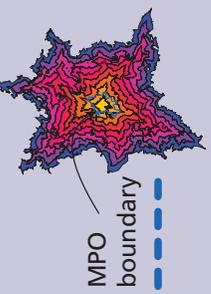
45-minute
travelshed

Overview of Oregon's MPOs and their travelsheds





**Auto travel times
(5 minute intervals)**



**% change in average
daily trips 1998-2004
(line color)**

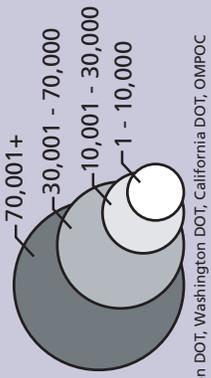


**2004 Annual average
daily trips
(line width)**



Source: ODOT

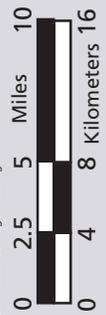
**2004 Annual average
daily
trips**



Source: Oregon DOT, Washington DOT, California DOT, OMPDC



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Portland Metro

A look inside the 45-minute travelshed

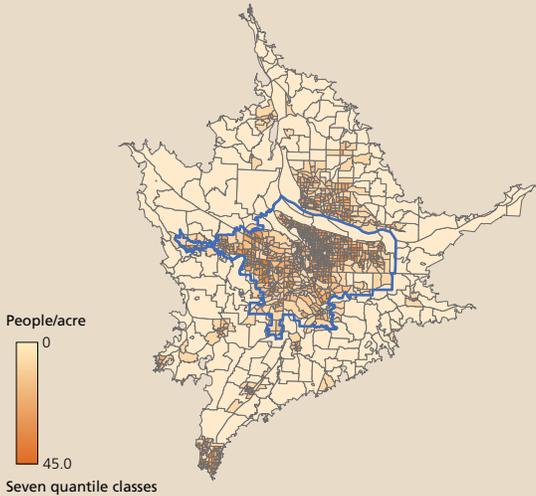
Home to more than 1,500,000 residents, the Portland metropolitan area is defined by Multnomah and parts of Washington and Clackamas counties and accounts for more than one-third of Oregon's total population. Multnomah County is the state's most populous county with a population density of 1518 per square mile, much higher than the state average of 35.6 per square mile. Washington and Clackamas counties, home to unincorporated

non-urbanized areas, are still experiencing rapid population growth due in part to expanding employment opportunities and residential options.

The Portland metro area is further defined by a close relationship with the city of Vancouver and Clark County, Washington. The intermingling of population, employment and transportation between the Portland metro area and Clark County adds to the complexity of the region and informs its overall character. The area continues to be characterized by growth. The tri-county area is projected to exceed 2.5 million residents by the year 2035.

- 64.2 percent of the population within the travelshed resides within the MPO boundary.
- 51.2 percent of the urbanized land within the travelshed lies within the MPO boundary.
- 7.1 percent of the farmland within the travelshed lies within the MPO boundary.
- The Portland metro area has four of Oregon's largest cities, Portland, Gresham, Beaverton and Hillsboro.

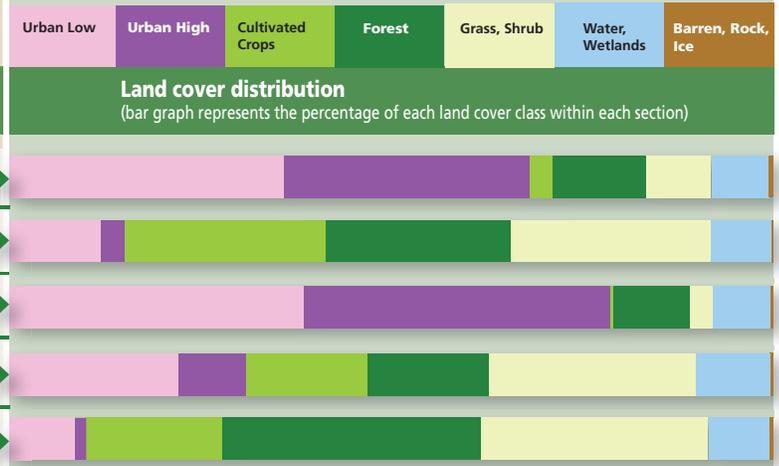
Population density



| | Population | Density (pop/acre) | Total acres |
|---------------------------|------------|--------------------|-------------|
| Inside MPO | 1,267,895 | 4.28 | 296,328 |
| Outside MPO | 705,540 | 0.58 | 1,221,157 |
| Within 15 minutes of city | 1,070,485 | 5.37 | 199,483 |
| 15-30 minutes from city | 610,198 | 1.13 | 541,360 |
| 30-45 minutes from city | 292,752 | 0.38 | 776,642 |

*Population figures from 2000 US Census block groups

Land cover



* Land cover classifications are aggregations of 2001 USGS NLCD classifications

Portland Metro

Major issues and challenges

Transportation needs

The Portland metropolitan area is governed by an elected regional government, Metro, which also serves as the Metropolitan Planning Organization (MPO) for the area. Motivated by the population and employment growth projected for the region over the next ten to fifteen years, Metro is working with regional partners to preserve the area's access to efficient and well-maintained transportation. A regional economy that is dependent on providing reliable access to gateway facilities requires a transportation system that supports the needs of local, national and international industries. The economic health of the Portland area is bolstered by the high quality of life that residents enjoy. This, along with an educated labor force and relatively low cost of living, helps attract industries to the region. Transportation investments must be designed to maintain the character and quality of life in the region while providing efficient access to and movement of goods and people.

Funding gaps

Without any changes to the current transportation system, the needs of a growing population cannot be met. The demands on freight transportation alone are expected to double the amount of goods that travel through and around the region. The key challenge is a growing gap between funding available for new investments in addition to the need to maintain the existing transportation network. The Portland metro area must prioritize both investments and strategies that enhance mobility and quality of life.

Looking ahead

Metro continues its long history of coordinating the decision-making process around transportation issues that affect the region. Currently, Metro and its regional partners are conducting an infrastructure inventory to find new ways of paying for sewer, water, stormwater and transportation services. With an urban growth boundary review scheduled for 2009, regional partners are already working together to decide which lands should and should not be urbanized in the coming decades and how to add capacity where services are available or feasible. As part of the state Regional Transportation Plan update, Metro and its partners are working to evaluate mobility on a regional corridor level

and create new systematic performance measures and criteria to help prioritize transportation investments throughout the region.

One challenge lies in the limited coordination among the growing communities outside the MPO boundaries, such as Canby, Newberg and Sandy, which are often affected by the Portland metro region's activities. Another challenge lies in an increasingly complex relationship between the Portland metro and Vancouver areas. These two areas are linked by shared commuters, residents and serious congestion. The MPOs for the two areas are working together to address the transportation needs of the larger region; however, the lack of shared land use policies on both sides of the river presents a constant challenge.

Salem-Keizer

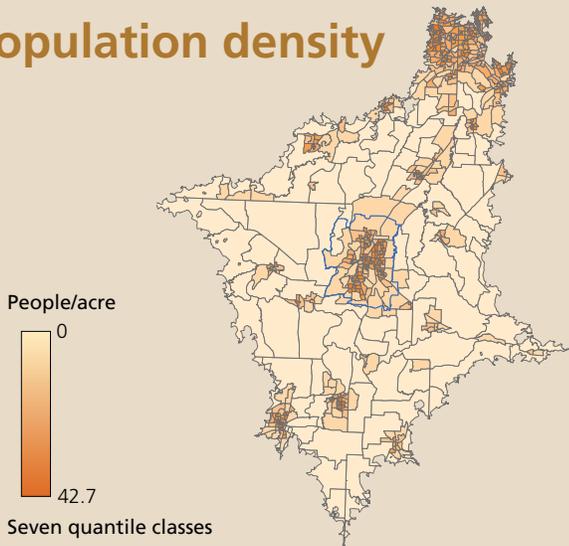
A look inside the 45-minute travelshed

Located at the southern end of the Northern Willamette Valley, the Salem-Keizer metropolitan area comprises Marion and Polk counties. The most recent growth rate for the area is 1.4 percent per year. In the next 20 years, the population of the Salem-Keizer area is forecast to increase 40 percent from its 2007 population of 228,839. The

median age of 34.3 years for the Salem-Keizer urban area is slightly younger than the statewide median of 36.8 years. The area is also characterized by a large, fast-growing Hispanic population. Hispanics made up 20 percent of the population in 2007, up from 14.7 percent in 2000. The Hispanic population grew four times faster between those years than the total population, increasing by an average of 6 percent a year.

- 62.6 percent of the population within the travelshed resides within the MPO boundary.
- 18.3 percent of the urbanized land within the travelshed lies within the MPO boundary.
- 5.1 percent of the farmland within the travelshed lies within the MPO boundary.
- Marion and Polk Counties account for approximately 59 percent of the region's population.

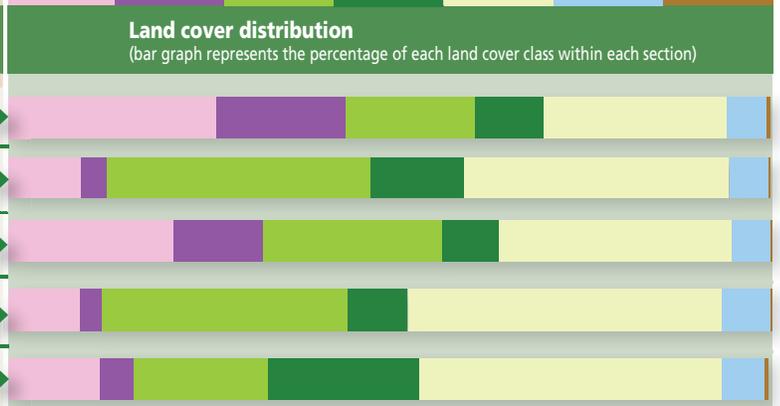
Population density



Land cover



| | Population | Density (pop/acre) | Total acres |
|---------------------------|------------|--------------------|-------------|
| Inside MPO | 208,765 | 2.41 | 86,692 |
| Outside MPO | 757,140 | 0.57 | 1,337,654 |
| Within 15 minutes of city | 221,229 | 1.60 | 138,417 |
| 15-30 minutes from city | 156,661 | 0.34 | 466,804 |
| 30-45 minutes from city | 588,015 | 0.72 | 819,125 |



*Population figures from 2000 US Census block groups

* Land cover classifications are aggregations of 2001 USGS NLCD classifications

Salem-Keizer

Major issues and challenges

Transportation needs

The population of the Salem-Keizer area is projected to increase by 40 percent over the next 20 years. Due to its central location in the valley, the area serves as a major hub for commerce, service, culture and government services in the north end of the Willamette Valley, attracting trips from neighboring cities, such as Dallas, Monmouth, Woodburn and Stayton. As the area grows, Salem-Keizer is working to balance urban and rural transportation needs with the need to preserve the area's quality of life so important to its residents.

The Salem-Keizer travelshed lies at the crossroads of the main north-south corridor, Interstate 5, and the primary link to Central Oregon and the coast, Highway 22. As a consequence, the area's highways handle a considerable amount of traffic that originates and is bound for destinations outside the Salem-Keizer area.

Funding gaps

Funding for the infrastructure and transportation services to accommodate the area's needs is inadequate. The recent increase in the cost of maintaining and constructing new infrastructure is exacerbated by the decrease in the purchasing power of the state and federal gas taxes due to inflation. In addition, infrastructure improvements are needed along Interstate 5 and Highway 22, as are improvements to corridors serving local needs. Funding adequate public transit services within the Salem-Keizer area poses a particular challenge: given the limited revenues available compared to the future needs of the Salem-Keizer area, bus and paratransit operations will quickly outstrip the resources available.

Looking ahead

Coordinating and implementing transit service between the cities and attractions in the Willamette Valley will also prove challenging. The Salem-Keizer area is currently using planning and corridor studies to help anticipate and plan for the future mobility needs in the area. The region's most visible planning study is the Salem Rivercrossing Environmental Impact Statement, conducted to determine the best travel option for crossing the Willamette River in Salem. Continued coordination between Salem-Keizer and its neighboring cities in assessing and prioritizing future transportation needs is crucial to advancing an efficient and successful transportation system.

The Oregon MPO Consortium

A metropolitan planning organization (MPO) is a transportation policy-making organization made up of representatives from local government and transportation authorities. Congress created MPOs in 1962, establishing them in urban areas with a population of more than 50,000. Oregon has six MPOs located in the Portland, Salem-Keizer, Eugene-Springfield, Rogue Valley greater Bend and Corvallis areas.

Congress created MPOs to:

- invest scarce transportation dollars appropriately
- create plans that reflect a shared regional vision
- examine investment alternatives
- facilitate collaboration of governments, interested parties and citizens.

To achieve these goals, the U.S. Department of Transportation helps fund the technical operation of MPOs, including the development of complex transportation models and gathering of travel data, and oversees consistency among MPOs through federal regulations. MPOs are required to demonstrate consistency annually.

MPOs also have a role in directly funding transportation projects through special grants from The United States Department of Transportation. Each MPO develops a program of transportation improvements using these funds, generally on a two- or four-year cycle. Because these funds are more flexible than Oregon's traditional gas tax, Oregon's MPOs have made creative use of these grants by targeting transportation dollars for urban

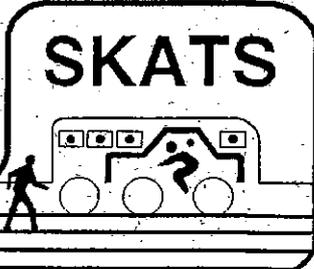
revitalization, transit improvements, bicycle and pedestrian facilities and transportation-related environmental restoration projects.

Oregon's MPOs are also regulated by the state's Transportation Planning Rule, which looks to MPOs to create local planning consistency across cities and counties in urban areas.

In 2005, Oregon's six MPOs formed the Oregon MPO Consortium, a collaborative group that seeks to share knowledge and experiences on urban transportation and advance urban issues at the state and federal level.

Oregon Metropolitan Planning Organization Consortium
www.ompoc.org





SKATS

SALEM-KEIZER AREA TRANSPORTATION STUDY

105 HIGH STREET SE, SALEM, OREGON 97301 PHONE (503) 588-6177 FAX (503) 588-6094

EXHIBIT: 8 AGENDA ITEM: 4
LAND CONSERVATION & DEVELOPMENT
COMMISSION
DATE: 4-21-11 *Vickie Hurdin*
SUBMITTED BY: *Woods for Clem*

April 19, 2011

Land Conservation and Development Commission (LCDC)
635 Capitol St. NE, Suite 150
Salem, OR 97301-2540

Dear Commissioners:

Metropolitan Greenhouse Gas Reduction Proposed Rule and Targets

As the MPO for the Salem-Keizer area, the SKATS Policy Committee reviewed and discussed the proposed Metropolitan Greenhouse Gas Reduction Targets and associated draft rule at our March 29, 2011, meeting. I am both the Chair of the SKATS Policy Committee and a member of the Target Rules Advisory Committee that reviewed the rules and targets.

The SKATS Policy Committee has serious concerns regarding the achievability of the proposed rule and 2035 target for our area. There is general concern that the rule will be an unfunded mandate with no guarantee of funding for scenario planning (if it is required in the future for our area) and no funding for implementation such as funds for transit operations or infrastructure such as sidewalks and bike facilities. Some members of the Policy Committee have characterized the proposed rule as unfunded, ineffective, and obtrusive. The city of Turner (population 1750) is inside the MPO boundary, but intercity transit service between Turner and Salem is extremely limited; and there are limited other opportunities to reduce VMT within or from Turner.

Regarding the proposed target of 18 percent for the Salem-Keizer area, we want the Commission to understand that in 2005, 53 percent of the vehicle miles traveled (VMT) within the SKATS area boundary came from external trips, which are trips with one or both ends outside of SKATS. That percentage is estimated to grow to 56 percent in 2035. External travel is -- for the most part -- out of the control of local planning efforts. The SKATS Policy Committee's position is that if the 18 percent target includes this external VMT, then reaching the target must be a shared responsibility of the state and local governments. Otherwise, that target can never be reached.

Based on these general concerns expressed by the Policy Committee Members, the following specific suggestions (in bold and underlined) are offered for changes to the proposed rule:

Proposed Rule Amendments:

1. Rule Section 660-044-0000(2):

"The targets in this division provide guidance to local governments in metropolitan areas on the level of reduction in greenhouse gas emissions to achieve as they conduct land use and transportation scenario planning. Land use and transportation scenario planning to meet the targets in this division is required of the Portland metropolitan area and is encouraged, but not required, in other metropolitan areas **and will depend in large part on the state providing additional and sufficient funding and support for both scenario planning and engaging the public on the costs and benefits of reducing greenhouse gases.**"

2. Rule Section 660-044-0025(3)(e):

"The greenhouse gas emissions reduction target for the Salem-Keizer metropolitan planning area is an 18 percent reduction in greenhouse emissions in the year 2035 below year 2005 emission levels:

- 1) **With 45 percent of the greenhouse gas emissions reduction target to be achieved through metropolitan area transportation and land use scenario planning performed by the local jurisdictions within Salem-Keizer metropolitan planning organization; and**
- 2) **With 55 percent of the greenhouse gas emissions reduction target to be achieved by actions and programs in an adopted Statewide Transportation Strategy.**"

Sincerely,
Dan Clem, Chair
Salem-Keizer Area Transportation
Study Policy Committee

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CITY MANAGER'S OFFICE

555 Liberty St SE / Room 220 • Salem, OR 97301-3503 • (503) 588-6255 • Fax (503) 588-6354

April 21, 2011

EXHIBIT: 9 AGENDA ITEM: 4
LAND CONSERVATION & DEVELOPMENT
COMMISSION
DATE: 4-21-11 Vickie Hardin-
SUBMITTED BY: Woods

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

RE: Agenda Item 4, April 21, 2011 LCDC Meeting. Proposed Metropolitan Greenhouse Gas Emission Reduction Targets Rules

Dear Commissioners:

The City of Salem would like to express concerns and recommend changes to the *Proposed Metropolitan Greenhouse Gas Emission Reduction Targets Rules*. As a member of the Salem-Keizer Metropolitan Planning Organization ([SKATS] MPO) the City has participated in target rulemaking efforts to-date; and is generally supportive of the proposed rules under consideration as a component of the broader greenhouse gas (GHG) reduction efforts of the Oregon Global Warming Commission. However, a degree of uncertainty remains as to whether the draft rules adequately reflect the need for funding to be provided to local governments to conduct and implement scenario planning, including continuing public outreach efforts; and whether sufficient emphasis is placed on the role of the Statewide Transportation Strategy in meeting the proposed targets.

Because land use and transportation scenario planning to meet targets is not required for the SKATS MPO at this time; DLCD staff concludes that the adoption of the proposed rules would not have a direct fiscal impact on local governments. However, the *Scenario Planning Financing Report* published by ODOT in January, 2011, estimates that land use and transportation scenario planning for each of the state's metropolitan areas could cost between \$200,000 and \$1.5 million. Language clarifying that adequate funding must be provided to MPO's to conduct land use and transportation scenario planning was incorporated into recent discussion drafts of the rule but is referenced somewhat indirectly in the *Proposed Metropolitan Greenhouse Gas Emission Reduction Targets Rules* document currently under consideration. In

addition, it is the City's position that efforts to reduce greenhouse gas emissions will require an ongoing public outreach campaign necessitating significant long-term funding. Toward that end and to provide clarification, the City proposes the following amendment:

1. 660-044-0000(2):

"The targets in this division provide guidance to local governments in metropolitan areas on the level of reduction in greenhouse gas emissions to achieve as they conduct land use and transportation scenario planning. Land use and transportation scenario planning to meet the targets in this division is required of the Portland metropolitan area and is encouraged, but not required, in other metropolitan areas. **and will depend in large part on the state providing additional and sufficient funding and support for both scenario planning and engaging the public on the costs and benefits of reducing greenhouse gases ."**

According to SKATS transportation modeling staff, external trips account for 55 percent of the vehicle miles traveled (VMT) within the SKATS MPO. External VMT cannot be reduced in a practical or significant manner by localized land use and transportation planning efforts. Indeed, research published by the Pew Center on Global Climate Change suggests that the range of potential GHG emissions reduction through land use and transportation scenario planning in established communities may be as little as 0.5% to 2%. It is therefore vital that responsibility for reductions in GHG emissions attributable to external VMT be allocated to efforts in an adopted Statewide Transportation Strategy. To the extent that each MPO can demonstrate the amount of external VMT inside their boundary, the targets detailed in the rule should be adjusted to allocate this responsibility accordingly. The proposed amendment to 660-044-0025(3)(e) (below) is illustrative of this approach and one way it could be applied to each of Oregon's MPOs:

2. 660-044-0025(3)(e):

"The greenhouse gas emissions reduction target for the Salem-Keizer metropolitan planning area is an 18 percent reduction in greenhouse emissions in the year 2035 below year 2005 emission levels;

- 1) With 45 percent of the greenhouse gas emissions reduction target to be achieved through metropolitan area transportation and land use scenario planning performed by the local jurisdictions within the Salem-Keizer metropolitan planning organization; and
- 2) With 55 percent of the greenhouse gas emissions reduction target to be achieved by actions and programs in an adopted Statewide Transportation Strategy.”

As concluded by the Target Rulemaking Advisory Committee (TRAC), the ability of local governments to meet the GHG emission reduction targets identified in the rule is largely dependent on adequate funding being provided to local governments to conduct and implement scenario planning. TRAC also concluded that responsibility for meeting GHG emission reduction targets must be a combination of MPO scenario planning efforts and other actions and programs in the Oregon Statewide Transportation Strategy, to be finalized later in 2011. The City appreciates the efforts of DLCD staff and TRAC in balancing the vision and expectations of SB 1059 and HB 2001 with the needs and concerns of Oregon's MPOs. We urge the Commission to take action to maintain that balance by considering the changes to the *Proposed Metropolitan Greenhouse Gas Emission Reduction Targets Rules* enumerated herein. We thank you for your consideration of this request.

Sincerely,



Linda Norris
City Manager
City of Salem
555 Liberty Street SE
Salem, Oregon 97301



City of Keizer

Phone: (503) 390-3700 • Fax: (503) 393-9437
930 Chemawa Rd. N.E. • P.O. Box 21000 • Keizer, OR 97307-1000

April 20, 2011

Chair of the Land Conservation and Development Commission
c/o Casaria Tuttle
635 Capitol Street NE Suite 150
Salem, Oregon 97301-2540

RE: Position Letter on Target Rulemaking Advisory Committee Recommendation for Green House Gas Reductions

The City of Keizer concurs with the memo from the Salem City Council Legislative Committee regarding the greenhouse gas reduction targets which should be part of the statewide strategy.

Salem Councilor Dan Clem has been representing our MPO on the Target Rulemaking Advisory Committee. He has been working with all the SKATS jurisdictions on drafting consensus on this issue.

Land use and redevelopment changes very slowly. Scenario planning impacts GhG more for new development than it does in redevelopment and infill. In addition, Keizer's shared UBG with Salem creates more commuting within the UBG than would occur if commercial land and accompanying employment was closer to the residential areas. Finally, more than half of the VMT in the SKATS area originates outside of the area. Major corridors such as Hwy 22, I-5 and Hwy 99E as well as major employers such as the State of Oregon, generate high VMT. Working cooperatively with the State to plan for GhG reductions, under an overall statewide strategy, will make it possible for Keizer and our partner jurisdictions in SKATS to achieve the 17% reduction proposed.

The City of Keizer recommends that the Target Rulemaking Advisory Committee adopt proposed language changes to link the Salem-Keizer area targets to the overall statewide strategy.

Respectfully,

Cathy Clark
Council President

Keizer City Council

EXHIBIT: 10 AGENDA ITEM: 4
LAND CONSERVATION & DEVELOPMENT
COMMISSION
DATE: 4-21-11
SUBMITTED BY: *Cathy Clark*

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Bureau of Planning and Sustainability
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EXHIBIT: 11 AGENDA ITEM: 4
LAND CONSERVATION & DEVELOPMENT
COMMISSION
DATE: 4-21-11
SUBMITTED BY: Tom Armstrong

April 21, 2011

Mr. John Van Landingham, Chair
Oregon Land Conservation and Development Commission
635 Capitol Street NE, Suite 150
Salem, OR 97301-2540

RE: Proposed Metropolitan Greenhouse Gas Emission Reduction Targets Rules

Dear Chair Van Landingham,

The City of Portland has been addressing climate change for nearly 20 years. Our efforts are achieving real results, with local carbon emissions reduced two percent below 1990 levels, differentiating us significantly from national trends. Perhaps the most important lesson learned from our local climate protection work to date is how long and how hard it is to realize results. Based on this experience, we are concerned that the state is overly optimistic about the pace of technological improvements. The problem with relying on technology is that changes in land use and transportation policy tend to have a much longer time lag to realize the benefits. If we don't have the effective land use policy in place in the early years, by the time we see if the technological changes materialize we will be facing an even steeper uphill battle. We also are concerned about the over reliance on the 2015 review to make mid-course corrections. The data is likely to continue to be muddled and not provide clear direction, so the danger is that it will be deferred another 4-5 years. **Given this potential for delay, we encourage the Commission to adopt more conservative estimates on the pace of technology change and in turn, adopt more aggressive reduction targets for transportation and land use changes.**

For more than 18 years Portland has sought to reduce carbon emissions, starting with the City of Portland's 1993 Carbon Dioxide Reduction Strategy, followed by the joint Multnomah County-City of Portland 2001 Local Action Plan on Global Warming, and most recently the Multnomah County-City of Portland 2009 Climate Action Plan. The 2009 Climate Action Plan (CAP) provides an innovative framework to guide the City and County's transition to a more prosperous, sustainable and climate-stable future. In doing so, it will strengthen local economies, create more jobs, improve health, and maintain the high quality of life for which this region is known. The 2009 CAP report can be found here: <http://www.portlandonline.com/bps/index.cfm?c=49989&a=268612>

The Portland-Multnomah County overall reduction goal is roughly consistent with the state's target and we use a similar approach to the proposed rules by establishing an interim 2030 goal that will put us on a path to achieve our 2050 goal to reduce emissions by 80 percent below 1990 levels. However, the proposed metropolitan targets are too dependent on significant advancements in technology—specifically vehicle fuel efficiency, carbon content of fuels, and changes in the vehicle fleet. We also are concerned about the aggressive assumptions in the fleet turnover rate and the percentage of the fleet that are light trucks. In general, we assume lower gains in vehicle fuel efficiency and lower reductions in the carbon content of fuels. The only area where we are more optimistic is in the share of electric vehicles. The result is our CAP 2030 target is a 28% reduction through land use and transportation actions.



City of Portland, Oregon | Bureau of Planning and Sustainability | www.portlandonline.com/bps
1900 SW 4th Avenue, Suite 7100, Portland, OR 97201 | phone: 503-823-7700 | fax: 503-823-7800 | tty: 503-823-6868

| | LCDC Rule | CAP |
|-------------------------------------|--|---|
| Auto Fuel Economy | Tech 3 68 mpg in 2035 (new vehicles) | Less than Tech 1 35 mpg in 2030 (fleet average) |
| Reduction in carbon content of fuel | Tech 3 20% by 2035 | Less than Tech 1 9% by 2030 |
| % VMT in electric vehicles | Tech 3 8% in 2035 | Tech 4 13% in 2030 |
| Vehicle Fleet Turnover Rate | Every 8 years (10 years in 2005) | |
| Light Trucks Share of Fleet | 29% in 2035 (43% in 2005) | |

We also are concerned about the over reliance on the 2015 review to make mid-course corrections. In four years the data is likely to be muddled and not provide clear direction, so the risk is that the hard decisions are deferred another 4-5 years. Meanwhile, a couple regional planning cycles will pass, which will make it more difficult to accelerate the land use and transportation changes that we will need to meet our goals.

If regional scenario planning is clearly an exploratory exercise to evaluate “what it would take” to achieve GHG reductions, then we should set the bar higher to see how far we can get through transportation and land use strategies. Then, as the technology gains are realized, we can adjust our land use and transportation policies accordingly.

While we have been able to reduced local carbon emissions to two percent below 1990 levels, we know that what is required to reduce our emissions by 75 to 80 percent is nothing short of the transformation of both our economy and our community, while strengthening the quality of life that makes the Portland region so exceptional.

Successfully tackling this challenge will require an unwavering commitment to the effort over the course of decades. We look forward to what our state and region can accomplish together.

Sincerely,



Susan Anderson
Director





OregonLive.com

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EXHIBIT: 12 AGENDA ITEM: 14
LAND CONSERVATION & DEVELOPMENT
COMMISSION
DATE: 4-21-11
SUBMITTED BY: Peggy Lynch

Oregon gas prices set April record; AAA study shows car-ownership costs accelerating

Published: Tuesday, April 05, 2011, 1:03 PM Updated: Tuesday, April 05, 2011, 1:22 PM



By **Joseph Rose, The Oregonian**



[View full size](#)

The Oregonian

Southbound traffic on Pacific Highway in Tigard.

Gas prices in Oregon have set an April record, with the price of regular unleaded averaging \$3.78 a gallon this week, according to the **AAA of Oregon and Idaho**.

The average price at the pump edged up three cents statewide and in the Portland area, where it hit \$3.76 a gallon. Nationally, the average price of gas soared a dime in the past week to \$3.69.

Retail gas prices are higher than they've ever been in April in the U.S, said AAA spokeswoman Marie Dodds. Gas prices are

at their highest level since September 2008.

"Unrest in northern Africa and the Middle East continue to put upward pressure on the price of crude oil," Dodds said, "and pump prices have also been on the rise due to the annual change from winter-blend to the more expensive summer-blend gasoline."

Please add to the record

At the same time, AAA released its annual "**Your Driving Costs**" (PDF) study, showing a 3.4 percent increase in the yearly costs to own and operate a standard passenger car in the U.S.

The average cost of driving a sedan rose 1.9 cents per mile to 58.5 cents, or \$8,776 per year, based on 15,000 miles of annual driving. SUV costs are up to \$11,239 yearly, or 74.9 cents per mile, the study said.

The study showed that depreciation continues to be the largest cost for vehicle owners. Yet it is frequently "the most overlooked by consumers determining the cost of owning and operating a vehicle," researchers found.

The study showed a 4.9 percent increase in depreciation costs, averaging \$3,728 yearly for sedans driving 15,000 miles annually.

Although costs for maintenance and insurance have decreased, relatively large increases in fuel, tires and depreciation more than wiped out those savings. And while many vehicles are more fuel efficient these days, it's not enough to offset the rise in gas prices, Dodds said.

Crude oil is trading at about \$108 per barrel today, up from \$104 a week ago. Crude broke through the \$108 threshold Monday, reaching the highest price since September 2008.

Analysts continue to worry that violence in Libya and escalating unrest in Syria and Yemen may disrupt the flow of oil from the region, according to AAA.

Find the best gas prices in the Portland area, courtesy of **The Oregonian's gas price tracker**.

-- **Joseph Rose**; Twitter, **pdxcommute**

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WASHINGTON COUNTY OREGON

April 20, 2011

John Vanlandingham, Chairman
LCDC
635 Capitol Street NE, Suite 150
Salem, OR 97301

Subject: Comments on the Proposed Administrative Rule for Greenhouse Gas Emission Reduction Targets

Thank you for the opportunity to comment.

We are supportive of the rules as written, which we deem to be founded on sound technical information.

While we are supportive of the Commission acting on the proposed rules, we feel it is important to provide some general perspectives on the role land use and transportation should play in helping meet State greenhouse gas emission reduction goals.

Fulfilling the vision in the Portland Metro area will be difficult and will require many hard choices along the way.

We remain supportive of the 2040 Concept in the Portland area, but frankly struggle with whether there is enough public support to fully implement the vision. For example, there appears to be strong backing for the concept of increased public transit. But when "increased public transit" means significantly higher payroll taxes, property taxes or transit fare rates, the support dwindles. Building more neighborhoods designed to get people where they need to go by walking, biking or public transit seems to have broad public support. However, support often wanes when, in a constrained UGB, implementing this vision includes the tough realities of upzoning property within or near established single-family neighborhoods, providing subsidies to trigger denser mixed-use development. We trust that the region will continue to make "baby steps" in the direction of fulfilling the vision. However, in our view from the trenches, these steps will not be easy. It remains very unclear whether the development market will actually deliver the desired urban land use patterns, and individual travel behavior will change significantly enough to deliver the desired emission reduction outcome.

Insist on a fully integrated discussion of the tough choices that lie ahead.

Based on the information we have seen, nearly 70 percent of greenhouse gas emissions relate to non-transportation sources, such as residential and commercial building energy, industrial and waste processes and facilities. While the Administrative Rules being examined today do not dictate the specific hard choices needed in the Metro area, we are aware that they point that way and will force that discussion. We know that the Administrative Rules being promoted respond to Oregon laws that dictate this work. That said, we would urge the Commission to promote and request that the legislature take a comprehensive approach to this issue whenever possible. Land use and transportation strategies should be compared and contrasted with other broad strategies. For example, increased funding for public transit can be compared to funding better livestock manure management, or providing subsidies for weatherization can be compared to subsidies for providing mixed-use denser development.

John Vanlandingham
April 20, 2011
Page 2

The County has a good understanding of how land use and transportation work. Getting our collective heads around greenhouse gas emissions related to light vehicle travel is possible. While we know the scenario work that lies ahead will provide more good information, we feel that any scenario developed will require tough choices that will be difficult to implement. Making these tough choices for local government may become more palatable if there is an understanding and trust that other sectors of government and industry have made equivalently tough choices. It is important that a disproportionate amount of responsibility for reducing greenhouse gas reduction is not placed on local or regional government.

Keeping all land use goals in mind as we go forward is critical.

When making Administrative Rules, LCDC has historically done an excellent job of balancing the 19 Statewide Planning Goals. We believe, as the state moves forward in an effort to address greenhouse gas emissions, balancing those goals will remain very critical. We are particularly concerned about meeting Goal 9 – Economic Development. We are supportive of responding to climate change as an economic development opportunity. Creating a business environment that stimulates and supports both mitigation and adaption technology makes good sense. That said, economic development is very competitive. It is important to realize that economic development is dependent on providing available land for economic development, a transportation system that gets goods to market and people to work, and a housing supply and type that compares favorably to other regions. We trust LCDC will keep economic development in mind with this and future decisions regarding greenhouse gas emissions.

Setting targets is a start. Keep an open mind as we move forward. This is a dynamic process.

As stated previously, we are supportive of the proposed targets (as reflected in the April 18, 2011 letter from Jerri Bohard), which we believe are based on sound technical information. Yet, as reflected and symbolized by the last minute change, this is a dynamic process where we all collectively continue to learn and adjust our thinking. We believe we will learn a significant amount from the future scenario planning efforts in the Portland Metro area. It is too soon to predict what we will learn, and there will surely be surprises. We would urge LCDC not to take too much ownership of the 20 percent reduction target. It is a good goal for now, but as we continue to learn over the next couple of years, viewing the 20 percent target as sacred will only hurt our collective ability at all levels of government to address this important issue. As we move forward, we urge LCDC to keep an open mind regarding greenhouse gas emission targets.

Again, thank you for the opportunity to comment.

Sincerely,



Brent Curtis
Long Range Planning Manager

c: Andrew Singelakis
Andy Back
Lisa Howard (via e-mail)

April 20, 2011

Land Conservation and Development Commission

Salem, Oregon

DRAFT METROPOLITAN GREENHOUSE GAS REDUCTION TARGETS

Dear Commissioners,

The Oregon chapter of the American Planning Association (OAPA) strongly supports the proposed greenhouse gas reduction targets and their timely implementation. The OAPA Board has adopted policy guidance in areas concerned with sustainability issues in the Oregon planning context, and this particular initiative is of great interest to our members. It is specifically cited in our adopted sustainability strategy as being of primary importance to good planning at all levels in Oregon.

Oregon has the most respected statewide planning program in the country, and has been a national leader in many aspects of professional planning practice since Senate Bill 100 was adopted in 1973. As climate and energy challenges and related sustainability concerns have become more serious in the last decade, it has become apparent that Oregon has fallen behind other states in its ability to directly address these issues. In particular, the relationship between greenhouse gases (GHG) and land use and transportation needs to be addressed much more vigorously. Climate science is clear about the nature of that relationship, and the need to address it as soon as possible. While we understand that land uses cannot be re-arranged quickly to immediately effect changes to ghg emissions, it is also clear that the long term problem cannot be solved without significant land use and transportation system changes. The long term health, welfare and prosperity of the state are dependent on aggressively addressing climate change at the local and regional level. Good planning practice is critically important to carrying this out.

For these reasons we ask that you pass these targets as the first step in configuring the planning process in Oregon to address this issue. We hope and fully anticipate that the legislature and the Commission in the very near future will support the necessary programs and training to make performance measures of this type part of the common practice of planning in Oregon. We also strongly urge the state to expand these requirements outside the Portland Metro area to ensure all parts of the state are contributing to achieving the state's ghg reduction goals. Along those lines, we anticipate that some Metropolitan Planning Organizations (MPOs) will need to expand their boundaries, and perhaps their authority, in the near future. We would therefore ask that the definition of "metropolitan planning area" not be restricted to lands within the boundary "as of the effective date of this division" (Definitions, page 4, line 3).

Thank you.

EXHIBIT: 19 AGENDA ITEM: 4
LAND CONSERVATION & DEVELOPMENT
COMMISSION
DATE: 4-21-11
SUBMITTED BY: Brian Campbell

Sincerely,

Brian Campbell, FAICP

President, Oregon APA



Oregon

John A. Kitzhaber, M.D., Governor

DEPT OF

APR 19 2011

LAND CONSERVATION
AND DEVELOPMENT

Department of Transportation

1158 Chemeketa Street NE

Salem, Oregon 97301

Phone: (503) 986-3435

April 18, 2011

To: Oregon Land Conservation and Development Commission

From: Oregon Department of Transportation

RE: Metropolitan Greenhouse Gas Reduction Targets, Proposed New Rules

The Oregon Department of Transportation (ODOT) acknowledges the challenge before the Land Conservation and Development Commission in setting greenhouse gas (GHG) reduction targets for Oregon's metropolitan areas. ODOT also appreciates the inclusion of the ODOT Commission Chair Gail Achterman as a member of the committee. Overall, the agency supports the proposed rules, these targets are an important part of the Oregon Sustainable Transportation Initiative (OSTI), along with efforts including the Statewide Transportation Strategy, Toolkit, Scenario Planning Guidelines, and public outreach. Each of these efforts plays off one another and helps to create a planning process in Oregon to reduce GHG emissions from transportation. To set GHG reduction targets will be the first OSTI effort to complete. Because the targets will be set before the ultimate end products for the other efforts are set, careful consideration should be paid to avoid over reliance on these in the rulemaking process.

As noted in the report you received from the Target Rulemaking Advisory Committee (TRAC), a metropolitan area's ability to reach a set target will depend on what the Metropolitan Planning Organization and its local jurisdictions can do, as well as federal and state policies. ODOT agrees with this assertion, because the Statewide Transportation Strategy policies will help Oregon reduce transportation sector GHG emissions, including inside and outside metropolitan area boundaries. However, specific statements in the TRAC report about what the Statewide Transportation Strategy will address and at what level of detail are uncertain at this point, because the STS Policy Committee is continuing to develop the specific components of this strategy.

The Statewide Transportation Strategy will include a long-range vision (to 2050) to reduce GHG emissions from the transportation sector the GHG emission reduction goals set forth in ORS 468A.205. The strategy will describe the general characteristics of transportation systems, vehicle and fuel technologies, and land use patterns (to the extent that land use patterns significantly affect transportation sector GHG emissions) anticipated to be necessary to achieve the reductions. The strategy will recommend new policies or significant changes to existing policies anticipated to be necessary to carry out the vision.

As stated above, the Statewide Transportation Strategy likely will identify policies that reduce emissions within metropolitan areas, however, there are a few important points that should be considered in the rulemaking process, including:

- The Statewide Transportation Strategy will be for the planning horizon 2050, while the targets will be for 2035.
- The Statewide Transportation Strategy will examine metropolitan area travel, but its focus will be statewide. Metropolitan areas are not likely to be investigated by individual locations, but as a whole and at a fairly high-level.
- The Policy Committee has not determined full picture of how the Statewide Transportation Strategy will consider such topics as intracity travel, intercity travel, and commercial travel. This will depend in part on the amount of detail needed for analysis, data available, and time, among other factors.
- There is no requirement in the legislation for a statewide GHG emission reduction number or target for transportation. The Statewide Transportation Strategy will develop a vision to reduce emissions and to develop policies to implement that vision to help the state meet its 2050 goal. Precise estimates of reductions expected at the state level will not be made. Any reported are likely to be general and will be for the transportation sector statewide, not broken out by metropolitan, or non-metropolitan areas.
- The Statewide Transportation Strategy is not a deterministic plan. Rather, it plots a general course to achieve goals based on current knowledge, analysis, and reflection. It will not of itself develop any programs or actions, but instead is one step in an iterative management process that also includes the monitoring of transportation and land use system changes, the evaluation of the relative success of policies and actions, and the improvement of methods and tools to evaluate prospective actions to reduce transportation sector GHG emissions.

Recognition of a linkage between the Statewide Transportation Strategy and the target rules being proposed will provide some additional clarification as to the direction of the STS.

The TRAC report mentions considerations or actions to reduce GHG emissions in Oregon economic sectors beyond transportation, such as electrical power generation, industrial, and residential. While acknowledging the committee interest, currently the legislative direction is limited to transportation and land use. The funding identified for the work in both the 2009 Jobs and Transportation Act (HB 2001) and Chapter 85 Laws 2010 (SB 1059) are ODOT funds, which are limited in use. Analysis and planning for GHG emissions outside the transportation sector would require alternative funding sources. Overall, ODOT views the OSTI work as a framework that will compliment GHG emission reduction efforts in the other economic sectors.

In addition to these general comments, ODOT has a few technical suggestions about the proposed rule.

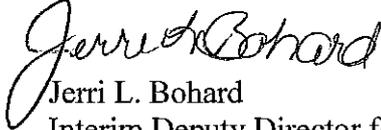
- Sections 660-044-0020(3) and 660-044-0025(3) cause confusion about how the percentage reductions are to be applied and are inconsistent with the definition in section 660-044-0005. ODOT suggests that the other sections mentioned above be modified to be consistent with the definition (660-044-0005), which captures how the percentage reductions were calculated in the *Agencies' Technical Report*.

- For Sections 660-044-0020(3) and 660-044-0025(3), updated calculations are available that reflect changes in calculations since the last Target Rules Advisory Committee meeting. ODOT discovered that estimates of 2005 per-capita vehicle-miles-traveled were not originally adjusted to be consistent with the metropolitan area population estimates. Doing so reduces calculations of the percentage reductions as follows:

| MPO | Proposed Rule | Latest Calculation |
|----------------|----------------------|---------------------------|
| Portland Metro | 21 % | 20 % |
| Central Lane | 21 % | 20 % |
| Salem-Keizer | 18 % | 17 % |
| Rogue Valley | 24 % | 19 % |
| Bend | 25 % | 18 % |
| Corvallis Area | 23 % | 21 % |

ODOT looks forward to continuing to work on this important endeavor with the Land Conservation and Development Commission and its staff, and appreciates the opportunity to provide these comments.

Sincerely,



Jerri L. Bohard
Interim Deputy Director for Operations

From: Cortright, Bob
To: Howard, Lisa
Cc: "Crall, Matthew"
Subject: FW: Proposed Rules - 660-044-0010
Date: Wednesday, April 20, 2011 5:00:24 PM

Lisa

Greg has asked that we include this email in the record for tomorrow's hearings on items 3 & 4.

Bob

From: MOTT Gregory [mailto:gmott@springfield-or.gov]
Sent: Wednesday, April 20, 2011 4:53 PM
To: CORTRIGHT Bob (OR)
Cc: TOWERY Jeffrey; GOODWIN Len; BOYATT Tom
Subject: Proposed Rules - 660-044-0010

Bob,

Good job on the proposed OAR addressing scenario planning to reduce greenhouse gas emissions. I consider most of these provisions to be clear, purposeful and well focused on the legislative intent of HB2001 and SB1059. I do have a suggestion, though, that I think would provide additional instruction and clarity to the MPOs that must undertake the task of scenario planning.

The inclusion of this new transportation planning requirement raises a question [for me] about the relationship between the TPR requirement for integrated land use and transportation plans that reduce vmt by 5%, and this new rule's requirement that GHGs generated by light duty vehicles be reduced by 21% per capita by the year 2035. My sense of this is that if we are able to reduce per capita vehicle miles traveled by any measure, but certainly by 5%, that there will be a reduction in GHG emissions since the mainstay of both requirements is reduced reliance on the automobile.

Most of the MPOs have acknowledged TSPs that either include assurances of successful vmt reduction or rely on alternative performance measures that are designed to achieve acceptable vmt reductions. These alternative performance measures expand the presence and accessibility of alternative travel modes, including transit, biking and walking. As a result people make fewer trips and drive shorter distances. While I can't say if there is a formula that accurately converts each percentage of vmt reduction into reduced GHG emissions, there clearly must be corresponding values between reduced vmt and a reduction in GHGs. It's my opinion that the existing MPO TSPs that include commitments to vmt reduction should be allowed to apply this result as a portion of the target GHG reduction that will be developed in the scenario planning supported by the following explanation: The development of an acknowledged TSP and comprehensive land use plan includes policies and measures that will result in a reduction of vmt during the planning period. Such reduced vmt also results in reduced per capita GHG emissions. The cumulative effect of these measures may be added to address the target of 21% reduction in per capita GHGs reduction.

EXHIBIT: 16 AGENDA ITEM: 4
LAND CONSERVATION & DEVELOPMENT
COMMISSION
DATE: 4-21-11
SUBMITTED BY: Greg Mott

I think text explaining this relationship should be included in the rule because even if the Department supported such an approach, there's nothing in the language of the rule that you could point to as validation of that support.

I'd also like to take this opportunity to voice my support for the changes to the TPR that appear as agenda item #3. In particular, I support the change that will eliminate the O60 evaluation for a zone change in conformance with an acknowledged plan's land use designation.

Thanks for your consideration of my comments. I would appreciate anything you can do to place this email into the record of the Commission's hearing on both of these rule changes.

Cordially,

Gregory Mott
Planning Manager
City of Springfield