

Summary of Public Comments

STS Multi-Agency Implementation Work Plan (2020-2022)

Overview

A total of 351 people responded to the survey, and 14 letters were submitted, on the 2020-2022 STS Multi-Agency Implementation Work Plan. Public comments were gathered from June 1st - June 15th 2020. A diverse group of stakeholders provided public comments, ranging from climate advocates to skeptics, and from the general public to businesses, organizations, other state agencies, and local jurisdictions. This diversity is seen in the tenor of comments that range from sentiments that the work plan does not go far enough, to concern that agencies are incorrectly prioritizing climate and spending too much time and resources on greenhouse gas (GHG) reduction actions.

Results from the survey and letters are compiled in this summary document. Data is organized by each survey question. Most questions gauged the level of agreement with actions identified in the Every Mile Counts work, and results are shown in the charts. The questions also included opportunities for people to provide more open-ended responses and that information has been summarized into themes. Themes from the letters are also included under the most closely related question. A sampling of direct quotes from the survey comments and letters is provided to illustrate more specific ideas or sentiments raised. At the end of the report, the major themes of the outreach and the multi-agency response to each of the themes is documented.

The raw survey results and comments, along with the comment letters submitted, can be provided upon request.

Summary of Findings

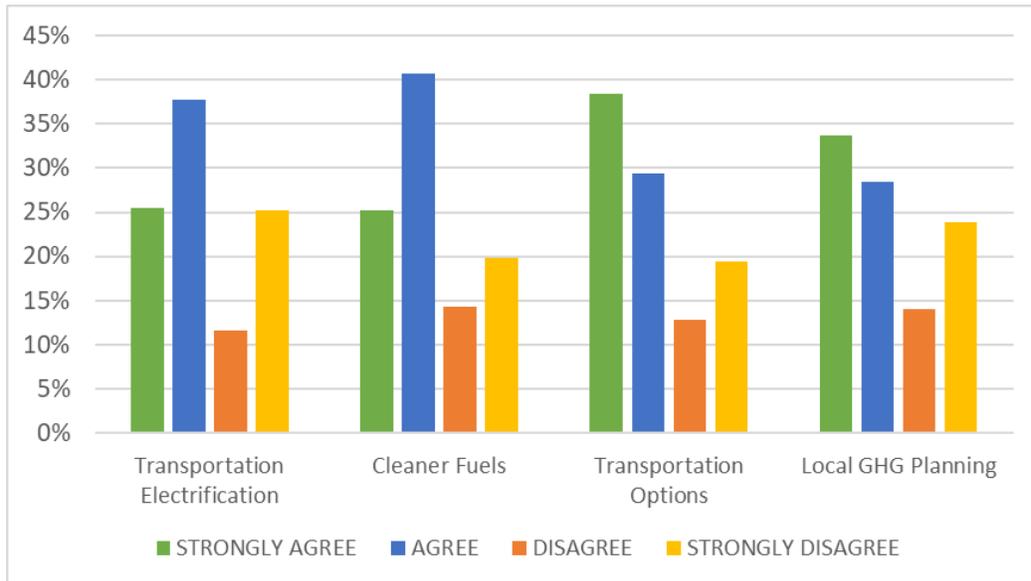
The majority of respondents (65%) indicated that they Strongly Agree or Agree that the agencies identified the correct mix of priority efforts for cross-agency collaboration. Within the focus areas the agencies selected, the highest agreement was for transportation options. However, the transportation options strategies the agencies selected (trip reduction policy and parking management) had the highest degree of pushback of any of the actions chosen in the work plan (41% disagreement). In the future, respondents would like to see additional transportation options strategies selected (more biking, walking and public transportation investments) and more on land use (supporting the ability to travel other than by car and greater transportation and land use integration). Other overall areas of disagreement (36%) included transportation electrification and local GHG planning. Most of the comments on transportation electrification reflected concern that it is an auto-focused action and that the agencies are relying too much on vehicles and fuels. For local GHG planning, there were a mix of sentiments throughout the survey results from higher levels of disagreement, to individual comments asking ODOT and DLCD to support local planning more. The open-ended comments at the end of the survey and in letters echo some of the sentiments already discussed, such as support for biking, walking and public transportation investments, more transportation options, and requiring and funding local GHG planning. In addition, several comments targeted the urgency of this work, asked for increased engagement with communities of color and low income, emphasized the need for continued collaboration, and expressed interest in more actions that can be applied to all parts of the state, including rural areas.

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Survey Responses

Question 1.

How much do you agree or disagree that the agencies identified the right mix of priority efforts that require cross-agency collaboration?



This question had a 96% response rate, with 337 responses and 148 comments.

65% of respondents indicated they Strongly Agree or Agree that the agencies identified the correct mix of priority efforts for cross-agency collaboration.

Comment Themes:

- Electrification and clean fuels are key components of emissions reduction, but they are not enough on their own.
- Increased transportation options that support walking and biking are needed.
- Ensure that some of these strategies and actions can work for rural areas.

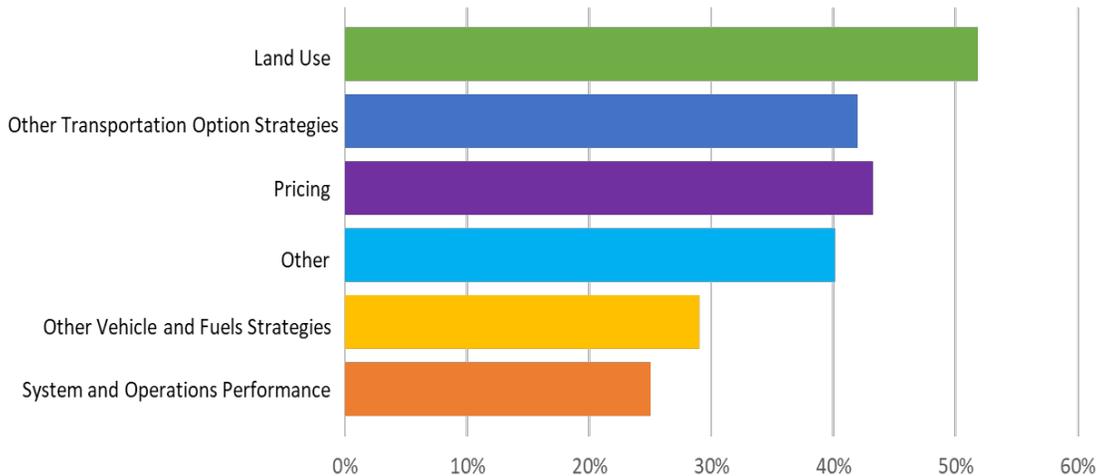
Comment Highlights:

- “Transportation options should be high priority: integrating land use and transportation planning to provide walkable, affordable and bike-able communities, where public transit is accessible.”
- “With no planned funding alternative, continued adoption of fuel-efficient vehicles, and additional mandates from EO 20-04, Highway Trust Fund revenues will dramatically decrease over time.”

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Question 2.

Are there other topic areas in the STS that require collaboration across the agencies that you wish would have been prioritized in the near term? Please select all that apply.



This question had a 92% response rate, with 324 responses and 130 'Other' category responses.

Respondents indicated that the agencies should prioritize Land Use and Other Transportation Options Strategies for actions in the near term. Pricing and "Other" actions were also ranked highly.

Respondents who indicated "Other" provided comments. Below are the main themes:

- Pricing actions should also include Tolling and Congestion Pricing for urban areas.
- State agencies should work to create affordable communities that are walkable, bike-able, and with good public transit.
- More incentives to encourage people to adopt electric vehicles are needed.
- ODOT and DLCD should do more to help local jurisdictions plan for climate change impacts.

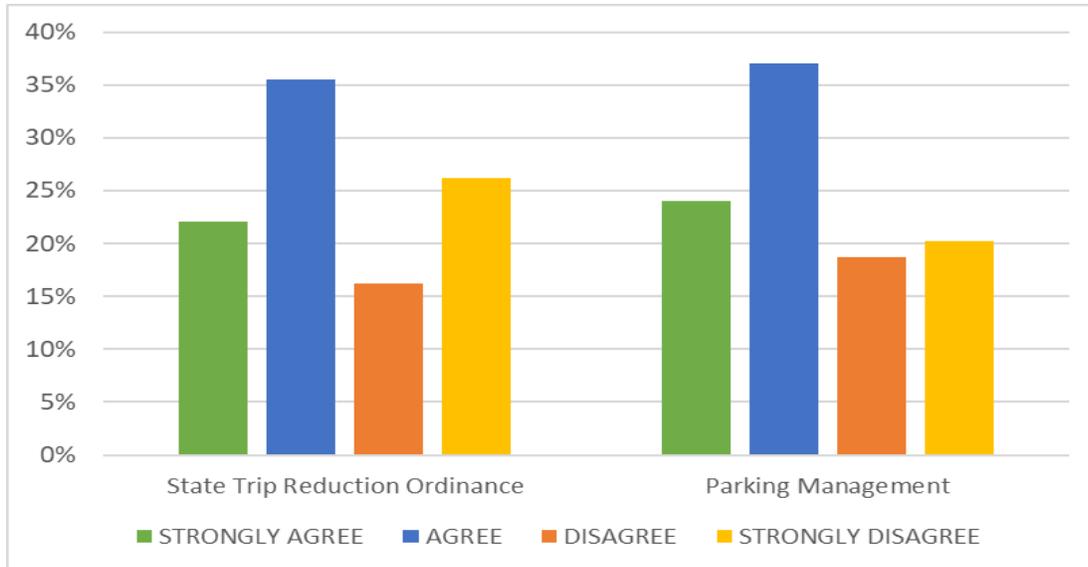
Comment Highlights

- "Explore opportunities where price signals drive the intended results."
- "Work to reduce VMT should also consider ways to increase electric VMT as a percentage of total VMT. This could take the form of electric vehicle preferences in lanes, parking, fees, or otherwise."
- "We believe that Oregon needs to adopt alternative funding sources to support carbon programs and carbon reduction goals that do not have an impact on resources necessary to preserve and maintain Oregon's roads, bridges, and highways."

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Question 3.

In an effort to target reduced VMT per capita, agencies identified transportation option actions focused on demand management. How much do you agree or disagree that the agencies prioritized the right transportation option actions?



This question had a 94% response rate, with 329 responses and 140 comments.

59% of respondents indicated they Strongly Agree or Agree that the agencies prioritized the right transportation option actions. These items, however had the highest amount of disagreement across the entire survey.

Comment Themes:

- More needs to be done to provide quality walking and biking infrastructure, improve transit service to encourage shift away from drive-alone trips.
- Incentives and programs should be created to encourage trip reduction.
- Transportation Options need supportive land uses to be effective methods for GHG reduction.

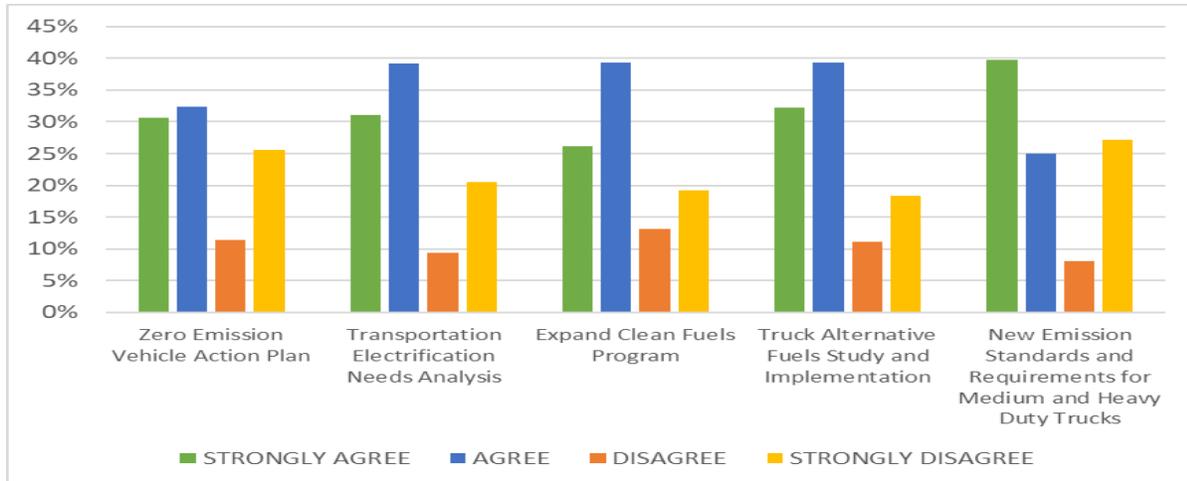
Comment Highlights

- “Expanding the ECO Rule in areas of the state where there is little to no transportation options infrastructure would be ineffective. This action should be replaced with a statewide transportation options needs assessment.”
- “The Parking Management strategies outlined in the document can be expanded upon to bring greater benefits. So many cities and suburbs have overly ample public and/or private surface lots and underutilized street parking. Funding for parking studies can identify streets that can be right-sized.”

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Question 4.

To support a transition to cleaner vehicles and fuels, agencies have selected actions that promote transportation electrification and regulations around the carbon intensity of fuels. How much do you agree or disagree that the agencies prioritized the right vehicle and fuel actions?



The question had a 96% response rate, with 336 responses and 118 comments.

67% of respondents indicated they Strongly Agree or Agree that the agencies prioritized the right vehicle and fuels actions. New emissions standards and requirements for medium- and heavy-duty trucks had the highest amount of people who strongly agreed across the entire survey. There was also a high amount of people who strongly disagreed with the action. The lowest level of support overall was for the ZEV action plan.

Comment Themes:

- More work needs to be done to support adoption of electric vehicles.
- Focus on electrification for all modes not just passenger vehicles (e.g. transit, e-bikes, etc.)
- More clean fuels options are needed for trucks and heavy vehicles.
- Strategies and actions are needed for freight and commercial vehicles.

Comment Highlights

- “DEQ should push for a stronger anti-idling statute. It would cost the state nothing. Heavy trucks simply should not be allowed to idle all night; the current law is too lenient given that heavy trucks can plug into electricity or use pony packs to provide electricity.”
- “The work plan should include transit expansion and support the electrification of both transit and school buses.”
- “The trucking industry is doing an amazing job making vehicles more efficient. Let industry drive its own progress. Government mandates make little contribution and actually undermine efficiency, productivity and job creation.”

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Question 5.

In an effort to better integrate GHG in decision-making the agencies selected actions to influence local planning efforts and to measure progress across climate activities. How much do you agree or disagree that the agencies prioritized the right decision-making actions?



This question had a 91% response rate, with 318 responses and 105 comments.

64% of respondents indicated they Strongly Agree or Agree that the agencies prioritized the right decision-making actions.

Comment Themes:

- Urban areas should be required to meet the GHG reduction targets, state agencies should help to provide funding and technical support and monitor progress towards the targets.
- State agencies should not require local GHG planning.
- Land Use and Transportation Planning are key to identifying actions for GHG reduction.
- The right mix of actions needs to be monitored to ensure progress is being made.

Comment Highlights

- “Land use must focus on significantly increasing all housing types in mixed use areas that are well-served with walking and bicycling.”
- “I believe that it is necessary to develop a method for municipalities and metro areas to regularly examine their GHG output to allow for changes on a more individualized and local level.”
- “Cities within MPO areas across Oregon already participated in a process to integrate GHG considerations and performance measures into local and regional planning and their work was set aside. It is critical that the hard work they already did be used as a starting point for any TPR updates.”

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Question 6. Additional Comments

The question had a 42% Response Rate, with 146 comments provided; in addition to the 13 letters.

Overall the respondents provided support for the work plan and the GHG reduction actions that the agencies identified. Respondents overwhelmingly indicated that climate related issues and emissions reduction is an important issue for Oregon.

Comment Themes and Highlights:

- More public engagement and targeted outreach and actions that address low income areas and communities of color
 - “Prioritize reducing barriers and delivering benefits to low income and communities of color who are the among the populations most susceptible to the impacts of climate change and least likely to be well-served by the transportation system now”
 - [paraphrase] Expand public engagement, focus on vulnerable populations. Train staff, target engagement, develop fact sheets on risks of inaction and differential impacts, encourage more youth participation, etc.
- Engage other state agencies and local jurisdictions in implementation actions
 - “Align implementation efforts with the State Health Improvement Plan... build climate resilience among priority populations, increase affordable housing co-located with active transportation options, and use green infrastructure to create safe, accessible, and affordable neighborhoods for low income, communities of color, and people with disabilities”
- Resource appropriately and speed up the work. Take action now to reduce the negative impacts associated with climate change.
 - “The proposed funding and timelines are too low and too slow --I urge you to move more quickly to get the work done, and to make every action as effective as possible.”
 - "The costs of continued greenhouse gas emissions are huge. At the same time the savings from rapid reductions in carbon emissions can be significant"
- Ensure long-term commitments to this work and hold yourselves accountable.
 - “As an immediate action, each commission should adopt a policy statement that authorizes, directs and encourages staff to begin implementing STS as agency conducts its planning work, especially with metropolitan areas.”

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- A variety of strategies for different types of communities is needed to encourage GHG reduction across the state.
 - “A different strategy is needed for rural areas vs urban areas. One size does not fit all.”
- Complements and concerns for the effort
 - “No part of this proposed plan is good for Oregon. All it will do is put increased financial pressure on people already suffering economic shortfalls without seeing equal return to the environment.”
 - “This initiative will likely do more to harm Oregon’s economy than it will to reduce GHG emissions.”
 - “We are glad to see state agencies taking critical steps to address the climate emergency. The scientific and economic evidence for rapid action is overwhelming. The impacts to our economy and social fabric grow more dire every passing month.”
 - “Thank you for your important work on this to date and thanks for soliciting our feedback.”

Word Cloud of open-ended comments



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Response to Outreach

In response to the feedback and comments received from the survey and letters, the agencies have identified a number of revisions to the work plan, as well as areas of the work plan and existing programs that relate to the comments and concerns received. The table below documents the major themes heard from stakeholders during the outreach and the multi-agency response to each of these themes.

Theme	Response
Apply an equity lens to the STS implementation actions to address needs of low income, communities of color, and people with disabilities.	Equity considerations for each action have been documented in the Appendix. The Work Plan has been edited to add a commitment to equity throughout the Every Mile Counts effort. The agencies will develop engagement strategies for each actions that will document the process and approach.
A variety of strategies for different types of communities is needed to encourage GHG reduction across the state. Ensure there are strategies and actions that can work for rural areas.	The Work Plan has been edited to clarify where actions apply to rural areas. Overall, the agencies will work to ensure a variety of strategies are in place that meet needs across the state.
Resource appropriately and speed up the work. Take action now to reduce the negative impacts associated with climate change.	The agencies are reprioritizing work to assure the timelines agreed to in the Work Plan can be met. Given existing resources, it may not be possible to move faster but efforts will be made to expedite implementation of actions.
Electric Vehicle and alternative mode investment will hurt Highway Fund and other revenue sources and divert already limited funds from existing needs.	ODOT, through its revenue forecast, and ODOE, through its Zero Emission Vehicle Biennial Report, look at the volume and impact of more fuel efficient and electric vehicles. ODOT has developed the OreGo Road Usage Charge pilot program to address Highway Fund impacts from electric vehicle transition and ODOT is pursuing this vehicle miles traveled fee as a replacement to the gas tax. A VMT has additional benefits not only to the stability of the Highway Fund, but also to reducing GHG emissions.
More incentives for all types of electric vehicles, not just cars, are needed to encourage adoption. Incentives and programs should be created to encourage trip reduction.	The STS work plan addresses the need for additional incentives through its priority effort of "Transportation Electrification". More information on incentive expansion can be found in the Appendix.

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Theme	Response
<p>Electrification and clean fuels are key components of emissions reduction, but they are not enough on their own.</p>	<p>The agencies have partially focused on cleaner vehicles and fuels because the STS shows that over half the solution include actions within these categories. Additionally SB 1044 requires a transition to cleaner vehicles and is a key part of reducing climate pollution. But the agencies also recognize that more is needed and thus the Work Plan includes a variety of actions. The agencies are also pursuing additional actions to support GHG reduction. New text has been added to the Work Plan to clarify that other efforts are moving forward.</p>
<p>More clean fuels options are needed for trucks and heavy vehicles. Collaborate with the private sector to develop strategies and actions for freight and commercial vehicles.</p>	<p>Multiple tasks in the STS work plan address the use of lower carbon intensity fuels, specifically the “Truck Alternative Fuels Study and Implementation” and the “Expand the Clean Fuels Program” actions.</p>
<p>More work is needed to identify EV charging deserts to increase adoption.</p>	<p>The Transportation Electrification Needs Analysis will look at charging gaps in the state, with special attention to rural areas. The Work Plan was edited to make this clearer.</p>
<p>Increased transportation options that support walking and biking are needed.</p>	<p>The Work Plan has been edited to be clear why some actions were not included in the multi-agency Every Mile Counts work. For example, bicycle, pedestrian and transit investment actions are under the single authority of ODOT and not multiple agencies. Active transportation investments are an important component of ODOT’s work moving forward to reduce transportation emissions. ODOT is also currently developing a pilot program to support zero emission transit agencies and increase adoption of cleaner transit buses.</p>
<p>Pricing actions should also include Tolling and Congestion Pricing for urban areas.</p>	<p>Same response as above. For tolling and congestion pricing specifically, actions were not included in the multi-agency Work Plan because those actions are under the single authority of ODOT. Pricing strategies are an important aspect of ODOT’s work to implement the STS.</p>
<p>Land Use and Transportation Planning are key to identifying actions for GHG reduction. Transportation Options need supportive land uses to be effective. ODOT and DLCD should do more to help local jurisdictions plan for climate</p>	<p>ODOT and DLCD recognize the key connection between land use and transportation and jointly manage several programs to support integration. Within the Work Plan the two agencies are partnering on several actions and to support local</p>

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Theme	Response
change impacts. Build on the good work of local jurisdictions that already exists.	jurisdictions in their existing work and for climate planning.
More aggressive and innovative pricing actions are needed for parking.	The Work Plan appendix has been edited to point to the need to integrate education and innovative actions within authority of state agencies.
The right mix of actions needs to be monitored to ensure progress is being made.	The agencies will monitor progress of the implementation of the actions in the Work Plan and progress towards the state GHG reduction goal through the Performance Monitoring Indicators and Analysis action.