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Climate Friendly and Equitable Communities Program
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OBJECTION: CENTRAL LANE SCENARIO PLAN DOES NOT COMPLY WITH DIVISION 44 RULES

The Central Lane Scenario Plan (CLSP) does not meet key requirements of OAR 660-044-0110(3) and should be returned to local jurisdictions to (1) revise the plan to include policies which commit local jurisdictions to adopt plan amendments and take other actions needed to achieve VMT reductions and (2) provide modeling and analysis of CLSP policies that demonstrates CLSP policies will achieve VMT reduction targets.

The CLSP, as submitted, fails to comply with OAR 660-044-0110(3) because it does not include policies that identify, adopt and commit local jurisdictions to carry out specific actions to reduce emissions and the because the analysis which asserts compliance with VMT reduction targets assumes actions and levels of effort that exceed and are not clearly part of the CLSP. The CLSP estimates of future VMT reductions are further flawed because they do not include strategies and policies consistent with the Statewide Transportation Strategy (STS) which call for 30% of all housing in highly walkable mixed use areas and expanded and increased charges for employee parking.

Each of these objections and recommended corrective actions are explained below.

- 1. CLSP does not meet OAR 660-044-110(3) because it does not include or adopt required “policies” needed to create a “complete” land use and transportation scenario plan¹**

¹ While generally exempt from requirements of 110, CL jurisdictions are required to adopt a scenario plan that complies with 110(3), (9) and 10: If these cities and counties use the preferred scenario from 2015, then they:

(A) Are neither required to redo the prior work that produced the preferred scenario, nor comply with requirements of OAR 660-044-0110 specific to the preferred scenario.

(B) Are required to produce only the additional elements that build on the preferred scenario to prepare a complete transportation and land use scenario plan, as provided in OAR 660-044-0110(3) and 660-044-0110(9) through (10).

OAR 660-04-110(3) requires that a land use and transportation scenario plan must include ... policies and strategies to achieve the applicable greenhouse gas emissions reduction target in OAR 660-044-0025 (emphasis added)

The CLSP doesn't comply with 110(3) because it doesn't include policies that adopt and effectuate the actions called for in the preferred scenario. Policies are necessary to establish a commitment and directive to carry out the plan. Policies are directive requirements and are supposed to express “ultimate policy choices” that guide subsequent plan implementation decisions. Without binding policies, the CLSP is essentially a set of recommendations.

CLSP does not include any identified “policies” and the plan, by its own terms, is not binding:

“The strategies are intended to be flexible and should be reconsidered over time. Most importantly, the preferred scenario is not a statement of regional policy and the strategies are not intended to be directive and are not regulatory.” CLSP, page 12

Similarly, the CLSP is clear that adoption of “policies” or policy changes that would commit to or implement strategies is not part of the plan and would occur later as part of some separate process:

[Scenario planning]... was conducted at a regional level and considered policy areas broadly. Before changing policy, jurisdictions may want to explore tradeoffs not included in this analysis, such as developing cost estimates, a detailed cost-benefit analysis, or a targeted analysis of the geographic distribution of benefits and impacts. CLSP, page 14

The 2025 update to the CLSP includes an “Implementation” Chapter, but this implementation chapter does not include policies² and leaves the adopted 2015 CLSP unchanged³:

² The amendment includes an Appendix A-1 titled “Policy Updates for 2015 CLSP Preferred Scenario” but neither the Appendix - nor other parts of the 2025 CLSP - adopt policies. Rather it is simply a review of efforts conducted between 2015 and 2025 that is used to inform further discussion of strategies: “An update on how the region’s policies, plans and actions are advancing the Central Lane region toward the strategies and outcomes described in the 2015 CLSP Preferred Scenario” which is used to inform a discussion about strategies - CLSP Appendix A-1 at page A-1.

³ “This Implementation Chapter is amended into the CLSP. It contains an updated perspective on implementing the CLSP strategies as well as the jurisdictional performance measures and performance targets required in OAR 660-044-0025. Since this Chapter was completed as a stand-alone effort to comply with updated OARs, this Chapter contains its own table of contents, acronyms, abbreviations, and appendices. The intent is to maintain what was approved by the MPC unaltered.” CLSP at p.27

While the CLSP includes strategies and performance measures and targets, these are not policies and do not substitute for policies for purposes of meeting 110(3). Again, on its face, 110(3) requires that a land use and transportation scenario plan include policies in addition to strategies and performance measures and targets. Strategies are expressed only as very general, non-binding recommendations about the types of actions that “would be needed” to realize the preferred scenario or that jurisdictions “could” take in the future. Performance measures and targets are not policies because their function is not to commit to or direct or require actions but simply to monitor and evaluate progress in implementing the plan.⁴

To comply with 110(3) DLCD needs to direct that the local jurisdictions formulate and adopt policies that direct and commit the jurisdictions to amend land use and transportation plans and take other actions that are needed and sufficient to carry out the preferred scenario.

(2) CLSP does not meet OAR 660-044-110(3) because the land use and transportation scenario plan does not achieve the relevant GHG reduction targets in 660-044-0025 because modeling assumes much more extensive and effective actions and levels of effort than those called for in the CLSP.

OAR 660-044-110(3) requires a plan that achieves targets:

A land use and transportation scenario plan must include:...

(3) Policies and strategies intended to achieve the applicable greenhouse gas emissions reduction target in OAR 660-044-0025. (emphasis added)

The applicable target in 0025 is a 25% reduction in GHG/VMT. CLSP claims, based on VE modeling analysis, that it meets this requirement because it will result in a 25.6% reduction in VMT.⁵ However, the CLSP does not meet this requirement because the

⁴ See 110(9) (9) requires “Performance measures and methodologies that cities and counties will use to report on implementation of the preferred land use and transportation scenario.”

⁵ Evidence that CLSP meets target is limited to a one-page conclusionary statements about VisionEval modeling which claims that the CLSP will achieve a 25.6% reduction in GHG emissions:

Target Rule Results

The LCOG Preferred scenario—using the VE-RSPM input assumptions as recommended above—is anticipated to achieve the OAR GHG reduction target for 2045 with a reduction of 25%. (CLSP Appendix C, page C20, June 2025)

Neither Appendix C nor any other part of the plan includes a reference or citation to documents which present the results of the VE modeling

VisionEval (VE) modeling analysis assumes and is based on a set of actions and projected outcomes that are not included in or required by the CLSP.

As discussed in Objection 1 above, at its core, the CLSP is a set of broadly-worded, non-binding strategies the jurisdictions might choose to adopt and implement at some later date. By contrast, the VE modeling analysis assumes that a very specific set of comprehensive actions will be adopted and implemented. These include a substantial expansion in transit service, a significant increase in bike/ped mode share and aggressive transportation demand management programs. As summarized in the chart below, these VE modeling assumptions are more aggressive, specific and effective than those called for in the CLSP

VisionEval Modeling assumes much more aggressive and effective actions than called for in the CLSP			
Major Actions⁶	VisionEval Modeling Assumption	CLSP Strategy Description⁷	Comment
Transit Service	90% increase in Bus/BRT miles per capita by 2045 ⁸	Support stable funding source for transit Support full-implementation of Frequent Transit Network (7 EMX lines)	Strategy identifies general need but does not include a policy commitment to provide level of transit service in VE modeling
Bike/Ped Mode Share	11% increase in bike/ped mode share for short trips 70% increase in bike/walk trips	Build bike/ped projects in adopted 20-year plans Increase spending on bike/ped projects Regional bike share program More federal Safe Routes to School Projects	No evidence that strategies will achieve projected increase Current MPO plan projects no increase in bike ped mode share from planned projects ⁹
TDM/Trans	60% of employees	"Education and marketing	No evidence that the

⁶ The estimate of active transportation mode share is an assumption - a modeling input - - it is not an output of the model:

4.3.25 DivertSovTravel

This module reduces household single-occupant vehicle (SOV) travel to achieve goals that are inputs to the model. The purpose of this module is to enable users to do 'what if' analysis of the potential of light-weight vehicles (e.g. bicycles, electric bikes, electric scooters) and infrastructure to support their use to reduce SOV travel. VisionEval Users Guide

⁷ CLSP Final Report, p. 15-22

⁸ CLSP Final Report, June 2025, Appendix C-8 increase from 15 miles per capita in 2005 to 28 in 2045

⁹ The 2021 RTP estimates that VMT per capita will increase by 6% and that non-auto mode share (bike, ped transit) will increase by just 1% (from 18-19% of all trips.)

portation Options	participate in a “high caliber” TDM program 10x current participation ¹⁰	programs <u>could</u> include workplace commuting programs, individual marketing programs (like SmartTrips), as well as <u>encouraging</u> expansion of car sharing programs.”	CLSP education and marketing programs are the kind of “high caliber” programs that VE assumes. ¹¹
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The CLSP does not comply with 110(3) because it is not supported by a factual base that shows that the scenario plan - as it is laid out in the strategies - meets 044 targets. In short, it's not reasonable to conclude that the very general actions proposed in CLSP strategies will result in actions and level of effort/aggression assumed in VE modeling.

To comply with 110(3) DLCD needs to direct that the CLSP be amended to add policies that adopt and direct actions and levels of effort assumed in the modeling analysis. Absent such policies the CLSP is inconsistent with the factual base used to support the conclusion that the plan complies with GHG targets in 0025.

3. CLSP does not comply with 110(3) because estimates of VMT reduction in CLSP are inconsistent with the Statewide Transportation Strategy and CFEC rules that direct local governments to plan for 30% of all housing in highly walkable, mixed use / climate friendly areas needed to accomplish VMT reduction targets.

The Statewide Transportation Strategy and the LCDC Climate Friendly and Equitable Communities (CFEC) Rules call for a significant increase in the amount of housing located in highly walkable mixed use neighborhoods as an essential element to achieve the level of VMT reduction set forth in Division 44 Target Rules. According to the STS and CFEC rules, urban areas need to accommodate at least 30% of all housing in walkable mixed use, climate friendly areas by 2050.¹²

While STS and CFEC rules direct cities to plan for 30% of all housing in walkable mixed use areas, the CLSP estimates that CLSP will result in less than 15% of the region's housing in highly walkable mixed use areas¹³ - half of what is directed by the STS and

¹⁰ CLSP Final Report, June 2025, Appendix B-17

¹¹ The VisionEval User's Guide, Concept Primer includes the following caution: “Caution: The model assumes high-caliber TDM programs are in place that produce significant VMT savings. Inputs should reflect this.”

¹² The Statewide Transportation Strategy calls for approximately 30% of urban households to live in compact mixed-use neighborhoods by 2035 and over 30% by 2050. STS Technical Appendix 5, page 152

¹³ CLSP Final Report, Appendix C-3 estimates that in 2045 16.2% of Eugene households and 5.3% of Springfield households will be located in mixed use areas.

CFEC. The CLSP strategies do not include any reference to these STS and CFEC requirements and do not explain how CLSP would achieve VMT reduction goals with significantly less mixed use development than prescribed by state planning directives.

Getting lots of housing (and employment) in highly walkable mixed use neighborhoods is well-understood to be essential to increasing use of alternative modes and reducing VMT. As the Salem-Keizer area reports in its scenario planning work:

Land use has a strong influence on our travel behavior and the transportation options available to residents. Places that are more densely built, that have a mix of uses, and that are well served by transit can provide residents with more travel options besides driving. More multifamily housing units and a higher share of households in more dense areas can help the region achieve greater greenhouse gas reductions with more people living near destinations. This reduces the need to drive longer distances and increases the potential of using active modes of transportation such as walking, biking, or taking transit. Land use is among the most powerful policy levers available to local governments to shape transportation emissions.¹⁴

To comply with 110(3) DLCD needs to direct that the CLSP be amended to include strategies and policies to accommodate 30% of all housing in climate friendly areas (CFAs) and other highly walkable mixed use areas consistent with the STS and CFEC rules.

4. CLSP does not comply with 110(3) because strategies for parking pricing in CLSP are inconsistent with the Statewide Transportation Strategy and unlikely to achieve VMT reduction.

The STS calls for a significant increase in the proportion of workers that pay for parking and the amount they pay as an essential strategy for achieving VMT reduction. The STS Parking Management Strategy calls for the coverage and prices to roughly triple from 2005 levels to 2050:

[By 2050] the average parking pricing is about 3 times higher than current rates, with parking rates as high as \$15/day in large MPOs (50% workers pay parking), \$7 in medium MPO areas (25% workers pay parking) ...¹⁵

¹⁴ Salem-Keizer Scenario Plan, Reference Scenario Documentation, November 2024, p. 11

¹⁵ STS Technical Appendix 5, page 145

The CLSP¹⁶ calls for only minimal increases in parking management. VE Modeling forecasts¹⁷ for implementation of this strategy assume:

- Less than 5% of region workers pay for parking (or receive parking cash out)
- Average parking will be less than \$4 per day (vs. \$3 in 2010 and 2020)
- No change in the areas where employees pay for parking

To comply with 110(3) DLCD needs to direct that the CLSP be amended to include strategies and policies to implement pricing parking consistent with the Statewide Transportation Strategy for Parking Management.

Conclusion

More than a decade of work reflected in the Statewide Transportation Strategy (STS) and the Climate Friendly and Equitable Communities (CFEC) rules clearly concludes that substantial changes to existing land use and transportation plans are needed to meet state climate goals. Essential changes include planning for most new development in the form of highly walkable, mixed use neighborhoods and remaking the transportation system to make it safe and convenient for people to drive much less than they do today. The CLSP falls well short of providing the kind of clear vision and blueprint for action that is needed- and required by Division 44 rules - to accomplish these changes. The Department needs to send this plan back to correct these deficiencies.

Sincerely,

Bob Cortright
Salem

¹⁶ CLSP, p. 20 "The preferred scenario calls for managing parking consistent with existing plans. Parking management strategy #1: Increase fees for long-term parking in some areas.. Eugene and Springfield may choose to expand the areas where commuters pay to park or to raise parking fees for publicly owned parking.

¹⁷ CLSP, C-13