

Public Support for Climate-Friendly & Equitable Communities



On March 10, 2020, Governor Kate Brown’s Executive Order 20-04 directed state agencies to meaningfully and urgently address climate change by developing measures to reduce Oregon’s greenhouse gas emissions that stem from land use and transportation planning in eight key urban areas.

Oregonians understand this Climate Friendly and Equitable Communities rulemaking process is a once-in-a-generation opportunity to tackle climate change head-on. By placing climate change, affordable housing, and equitable transportation choices at the center of how our cities are planned, built, and funded, we can create a brighter, healthier, and more inclusive future for all.

For these rules to achieve their full potential, they need to be strong, clear, and implemented with urgency.

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May 19, 2022

Land Conservation and Development Commission
 Department of Land Conservation and Development
 635 Capitol Street NE Suite 150
 Salem, OR 97301

RE: Oregon is ready to tackle climate change head-on

Dear Commissioners,

Climate change is here, and the time for tangible action is now.

The Climate-Friendly and Equitable Communities rulemaking process is a once-in-a-generation opportunity to achieve transformative outcomes for communities statewide. Increasing affordable housing options and ways to safely walk, bike, roll, and take transit will make our cities more climate-friendly, more equitable, and more livable.

The Commission has committed to creating communities that are “safe, equitable, sociable, and pleasant places where driving is not required, and the amount of driving is reduced.” To achieve this outcome the Commission must ensure that the rules it will soon adopt will put several critical policies in place:

- Climate Friendly Areas (CFAs) are intended to be the focal points for walkable, transit-friendly neighborhoods with diverse and affordable housing choices and nearby businesses. This means the rules should increase the possibilities for housing and employment in CFAs, and require cities to adopt affordable housing strategies.
- CFAs must provide abundant, safe, high-quality infrastructure for walking, biking, and transit.

- Transportation Investment priorities must change. The rules should prioritize accessible public transit, walking, rolling, and biking over projects that incentivize driving.
- To ensure these rules are enacted with urgency, clear and specific timelines for all key land use and transportation elements are needed.

The urgency to address climate change now cannot be overstated. So it is crucial that these rules are strong, clear, and implemented soon. Over 1,350 organizations, businesses, and individuals support the goal of this rulemaking, as well as the reasonable and necessary adjustments this Coalition of state-wide organizations is calling for.

Urgent and effective implementation of the Climate-Friendly and Equitable Communities rules will create more complete, vibrant, and accessible communities in Oregon with vital services nearby that can be accessed without the use of a car. By acting boldly to reduce carbon emissions with these rules, the Commission can help ensure a more climate-resilient, healthy, equitable future for Oregonians now and for generations to come.

Sincerely,

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 Charlotte Campbell
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 Carol Whipple

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Michael Maas	Nancy Bachman	Pamela Barlow
Michael Majowicz	Nancy Boyd	Pamela Edwards
Michael Mitton	Nancy Carl	Pamela Macgurn

Paola Landau	Phil Houston Goldsmith	Rich Schwartz
Patience Bingham	Philip Carver	Richard Benner
Patrice Roberts	Philip Ratcliff	Richard Bowden
Patricia Goodin	Philip Selinger	Richard Casey
Patricia Kenny	Philip Wallace	Richard Dolgonas
Patricia S Selinger	Phillip Callaway	Richard Kellogg
Patricia Stone	Phyllis Jaszowski	Richard Levy
Patrick Kennedy	Phyllis Pengelly	Richard Pross
Patti Calande	Phyllis Schmidt	Richard Snyder
Patty Lofgren	Polly Wood	Richard Weinhold
Paul Knight	Rachel Dean	Rob Bennett
Paul Lipscomb	Rajiv Batra	Rob Gabrish
Paul Morphy	Ralph Rauscher	Rob Garrott
Paul Nanawa	Ramsay Weit	Rob Knoth
Paul Runge	Randall Nerwick	Rob Kugler
Paul White	Randall Webb	Rob Zako
Paula Manley	Randy Smith	Robbie Gershon
Paula Yocum	Randy Tucker	Robert Albee
Paxton Rothwell	Ray Batch	Robert Bailey
Peg Reagan	Ray Curtis	Robert Carlson
Peggy Harkins	Ray Miao	Robert Currie
Peggy Yoder	Ray Neff	Robert Davis
Penny Hunting	Rebecca Charlton	Robert Hemphill
Penny Pritchard	Rebecca Crowder	Robert Hertert
Pepper Trail	Rebecca French	Robert Jones
Perry Brooks	Rebecca Gladstone	Robert Mckinney
Pete Perry	Rebecca Kay	Robert Pollock
Pete Sorenson	Rebecca Parker	Robert Ranta
Peter Brewer	Rebecca Pearson	Robert Thornhill
Peter Cornelison	Regan Fisher	Robert Verhoogen
Peter Geiser	Regan Gage	Robin Baraybar
Peter Green	Reginald Grier	Robin Rodgers
Peter Hatton	Regna Merritt	Robin Sack
Peter Johnson	Renee Clark	Robin Stalcup
Peter Larson	Rhett Lawrence	Robin Vesey
Peyton Jocelyn	Rich Peppers	Rocky Miner
Phil Carver	Rich Rohde	Rod Maack

Rodney Taylor	Sarah Stuart-Sikowitz	Sid Friedman
Roger Kaye	Sarah Walgenkim	Soeren Johnson
Rollston Frangopoulos	Sarah Welte	Sofia Lepore
Ron Mccracken	Sarah Worthington	Solomon Allen
Rona Homer	Savannah Wright	Sonia Battrell
Ronald Hutchison	Scott Davenport	Spencer Lennard
Ronna Craig	Scott Hutchins	Spencer Woolley
Ronnie Poklemba	Scott Kennedy	Stacy Butler
Rose Owens	Scott Shumaker	Stacy Flaherty
Ross Winsor	Sean Carpenter	Stan Fleming
Rowen Lucas	Sean Hanna	Stanley Oliver
Ruby Matthews	Sean Mccuen	Stephanie Arnold
Russ Gorsline	Serena Appel	Stephanie Noil
Russell Axelrod	Serena Gordon	Stephanie Noll
Russell Hoeflich	Serenity Ebert	Stephanie Routh
Ruth Zdanowicz	Seth Weiss	Stephen Alexander
Ryan Lapoma	Seton Wade	Stephen Bachhuber
Rynda Clark	Shae Davis	Stephen Funk
S Klof	Shaelynn Davis	Steve Greening
Sally Palmer	Shambala Zellers	Steve Hare
Salme Armijo	Shami Zellers	Steve Hill
Salvatore Hall	Shana Falb	Steve Long
Sam Huck	Shannon Hunter	Steve Oder
Samia Estassi	Shannon Jones	Steven Bruckner
Samuel Bedell	Shannon Mccarl	Steven Demarest
Samuel Goldberg	Sharon Evoy	Steven Novotny
Samuel Lewis	Sharon Hunt	Steven Schafer
Sandi Cornez	Sharon Steele	Steven Tichenor
Sandra Joos	Shaundi Woolley	Steven Winkler
Sandra Siegner	Sheila Dooley	Stratton Matteson
Sandy Thompson	Shelley Z. Klappholz	Stuart Liebowitz
Sara Martel	Sheri Facer	Su-Wen Chen
Sara Mckean	Sherry Costa	Sue Ann Alleger
Sara Wright	Sherry Logan	Sue Bastian
Sarah Deumling	Shirley Moffat	Sue Craig
Sarah Graham	Shirley Nelson	Sue Kozin
Sarah Munk	Shirley Weathers	Sue Leonetti

Sue Privitera	Tammy Alunan	Tracy Tindle
Sue Staehli	Tana Hatton	Travis Mack
Sue Ward-Mccurdy	Tandra Schmid	Tristen Madron
Susan Albright	Tanya Owen	Twila Jacobsen
Susan Bladholm	Tasha Harmon	Ursula Horstmann Nash
Susan Caswell	Tashia Davis	Usha Honeyman
Susan Connolly	Tawny Howlett	Ute Saito
Susan Conrad	Taylor White	Val Snyder
Susan Delles	Taylor Withers	Valerie Snyder
Susan Drew	Ted Lapage	Vicki Nunenkamp
Susan Fthenakis	Teddy Charlton	Victor Conway
Susan Gaylord	Teresa Mueller	Victor Ortega
Susan Hansen	Teresa Smith-Dixon	Victoria Eells
Susan Hart	Tessa Boone	Victoria Koch
Susan Haywood	Tessa Scheller	Victoria Paykar
Susan Heath	Theresa M Bush	Virginia Feldman
Susan Khalsa-Wyborski	Thomas Larson	Virginia Olea
Susan Koger	Thomas Musselwhite	Virginia Sackett
Susan Marrant	Thomas Riddering	Vivian Satterfield
Susan Principe	Tia Hatton	Walt Mintkeski
Susan Sanford	Tim Irby	Walter Englert
Susan Schradle	Tim Page	Wanda Gledhill
Susan Strauss	Timothy Smith	Wanda Graff
Susan Thompson	Tina Myers	Wanda Partin
Susan Uravich	Tobias Boyd	Wayne Lewis
Susan Wolling	Todd Looby	Wayne Stewart
Susanna Defazio	Tom Gihring	Wendi Fox
Susannah Lapoint	Tom Gilles	Wendy Boyer
Suzanna Nadler	Tom McTighe	Wendy Holzman
Suzanne Krueger	Toni Colotte	Wendy Mortensen
Suzi Maresh	Tonia Moro	Wesley Wada
T Jeffries	Tonya Stiffler	Wesley Ward
T Keith	Traci Engel	Will Green
T S	Tracy Glenn	William Gilbert
Tamara Donnelly Glass	Tracy Habecker	William Heerdt
Tamara Houston	Tracy M Lord	William Kepler
Tamara Stephas	Tracy Richards	William Koch

William Lynn
William O'Brien
William Sweat
William Sweigert
Willow Denker
Wrika Kightlinger
Zach Gustin
Zach Mulholland
Zechariah Heck
Zed Langston
Zoe Griffith
Zoe Zagorski
Zora Hess



CITY OF BEND

May 18, 2022

Land Conservation and Development Commission
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CITY MANAGER
Eric King

RE: Climate-Friendly and Equitable Communities (CFEC) Rulemaking

Chair McArthur and Commissioners:

The City of Bend formally supports the policy framework for Climate-Friendly and Equitable Communities as it is presented here today.

This framework represents a tremendous amount of work by many stakeholders, by the agency, and by the commission. Yet that amount of work will pale in comparison to the amount of work that local communities – and city governments in particular – will have to do to implement these rules effectively throughout the state.

CFEC's success is far from assured. Strong assistance and collaboration from the State will be essential for Bend and other cities to achieve meaningful climate mitigation outcomes.

We know that climate change cannot be tackled through local initiative alone. It must be addressed systematically at all levels of government. Yet, a state-level policy framework requires strong and ongoing state-level support to succeed.

Our support for the CFEC policy framework is premised on the provision of financial resources for local implementation and a willingness to both acknowledge the difficult task ahead for cities and work with us to ensure successful implementation.

Regarding financial support, we call upon the agency and commission to advance a robust Policy Option Package for local government CFEC implementation. We believe that the costs for our city alone, between now and the end of the next biennium, may reach and perhaps even exceed \$5 million.

We estimate full and robust CFEC implementation to be in the range of \$7-9 million and perhaps as high as \$10 million. Because the work will extend beyond the 2023-25 biennium, a follow-up funding request for the 2025-27 biennium will also be needed.

To be clear, these are costs that we would not bear were CFEC implementation not required. And these are costs of robust implementation needed to best assure full and equitable public engagement and ultimately meaningful climate mitigation outcomes. We don't have the local funds to do this work without major impacts to core city services across the board, not to mention work on other climate-related initiatives already underway.

Although DLCD is a land use planning agency, the CFEC rules that DLCD is seeking to advance are sweeping – as they must be to effect meaningful action on climate change. The rules will require both land use planning policy compliance and transportation planning policy compliance. Cities should not be asked to use local funds to implement this newly mandated work. We believe the primary burden to secure financial assistance for full CFEC compliance lies with DLCD. Whether in concert with other agencies or not, DLCD needs to do everything in its power to secure these funds.

In addition, and just as importantly, we call upon both the agency and the commission to fully commit to helping cities achieve CFEC compliance. We will face many hurdles. The rules present many clear challenges that we're already aware of. They likely present challenges that won't be apparent until later. We will need not just your assistance in complying with the rules as drafted but also your willingness to adapt the rules if it proves necessary to do so.

In particular, we call upon the agency and commission to commit to working with any city that's interested in developing a localized work plan and to grant them the flexibility they need to be successful – not just in complying with the rules, but in avoiding negative outcomes in other areas, for example the provision of affordable housing.

Our own staff has met several times with DLCD in order to assess our ability to develop a custom work plan. We are very appreciative of the opportunity to have had these discussions. We believe that a work plan will give us the best chance of a successful outcome and ensure integration of CFEC related work with other related work the City is mandated to complete.

We are incredibly lucky in Bend to live amongst some of the most beautiful natural surroundings in the State – it is the reason many of us choose to live here. The City of Bend understands that the threat of climate change is happening here and now. Drought threatens our rivers, our farms, our fish, and our wildlife. Fire threatens our forests and our homes. Heat threatens all of us, but threatens the most vulnerable in our community the most acutely.

There is no time to waste in moving forward with climate action. We support the CFEC framework and rules. Our support is coupled with our urgent request for the funding and flexibility that we and every other city will need in order to make these rules successful.

Sincerely,



Melanie Kebler
City Councilor



Anthony Broadman
City Councilor



Land Conservation and Development Commission
Attn: Esther Johnson, Commission Assistant
635 Capitol St. NE, Suite 150
Salem, OR 97301-8911

May 11, 2022

Dear Commissioners:

Thank you for the opportunity to comment on the Department of Land Conservation and Development's Draft 2023-25 Policy Action Packages (POPs) in relation to the Climate Friendly and Equitable Communities (CFEC) rulemaking process. The City of Beaverton is prepared to implement the rules, yet we lack the resources to do so. The proposed POP for grants to facilitate CFEC implementation needs to be increased significantly and **we urge the agency and the Commission to add at least \$30 million in grant funding for local agencies** to do the work required by these new rules. The success of this rulemaking depends on its implementation.

Recognizing that the exact requirements in the Portland Metro area are still to be determined, and assuming they will likely be in line with what is expected of other jurisdictions around the state, the City of Beaverton expects its costs of implementation alone will be in the range of \$4-8 million. Some costs, like those associated with creating a more robust community engagement program to support related planning and development projects, will require both one-time *and* sustained grant funding.

Beaverton will use both in-house resources and consultants to accomplish what needs to be done and will look to be efficient with peoples' time and resources, however there is no denying additional resources will be required for such large shifts in policy and processes, particularly those that are to be implemented and co-created with community, in a relatively fast timeframe. The rules require a paradigm shift and at a pace not normally taken, therefore we ask these grant programs be set up and available within 60 days of legislative approval.

With this in mind, we respectfully urge that additional grant funding be added to POP 201 – Equitable Community Engagement: Rulemaking or Goal Revisions to assist local jurisdictions with being able to be stand up and maintain more robust and coordinated community engagement programs. Likewise, we request additional grant money be added to POP 203 – Climate Friendly and Equitable Communities, to assist local jurisdictions with the policy and code changes required quite soon, particularly around parking reform. These additional grant funds should total at least \$30 million to provide adequate resources to local jurisdictions.

Finally, we urge DCLD and LCDC to continue to work with the Oregon Department of Transportation (ODOT) and the Oregon Transportation Commission (OTC) to allocate funding for all localities, including those within the Portland Metro area, to assist with updating Transportation System Plans (TSPs). \$15 million statewide is also insufficient to update those plans. **We urge LCDC to request the OTC to add another \$15 million to this funding allocation, for a total of \$30 million dedicated to updating TSPs.**

We look forward to working with you and others to create a healthy and equitable future. This rulemaking is an important step. Let's make it both bold *and* implementable.

Sincerely,

Cheryl Twete

Cheryl Twete
Community Development Director

Cc: Beaverton City Council

Mayor Lacey Beaty

Jenny Haruyama, City Manager

Casaria Taylor, DLCD

Bill Holmstrom, DLCD



CITY OF BEND

May 12, 2022

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CITY MANAGER
Eric King

Dear City Councilors:

The Environment and Climate Committee (ECC) has been following the development of the Department of Land Conservation and Development's (DLCD) proposed Climate Friendly and Equitable Communities (CFEC) rules through the rulemaking process. In a recent monthly meeting, the Committee also heard an update about the draft rules and schedule for adoption from city staff. The ECC is strongly supportive of the proposed CFEC rules and therefore, on May 12, 2022, voted to request that Council write a letter in support of the proposed rules for the Land Conservation and Development Commission (LCDC) hearing on the CFEC rules scheduled for May 19, 2022.

The ECC is supportive of DLCD's Climate Friendly and Equitable Communities rules because they will aid Bend in achieving several goals and actions in the City of Bend Community Climate Action Plan (CCAP). The CFEC rules make significant changes to Oregon land use and transportation planning that prioritize bicycle, pedestrian, and transit and impose vehicle miles traveled reduction targets consistent with regional GHG reduction targets.

The City's current (2016) climate goals are to reduce community fossil fuel use by 40% by 2030 and by 70% by 2050. The CCAP goals and actions for transportation, if achieved, would result in a 44% reduction in GHGs from the transportation sector. The 2020 Transportation System Plan plans for only a minimal decrease in VMT through the 2040 planning period. The City's currently planned transportation projects and programs will not do enough to "move the needle" on reducing GHGs from transportation consistent with the CCAP. The new rules would help align the City's transportation planning with the targets established in the CCAP.

ECC recognizes that adopting and implementing the CFEC rules in Bend will require significant additional financial and technical resources from the state and the Committee supports efforts to advocate for additional resources to implement the new rules.

We encourage the City Council to publicly support efforts for the Climate Friendly and Equitable Rules and look forward to supporting implementation of the rules once adopted.

Sincerely,

Neil Baunsgard, Chair
Environment and Climate Committee



CITY OF BEND

March 18, 2022

Dear City Councilors:

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The Core Area Advisory Board (CAAB) convened on Thursday, March 17th to discuss the Department of Land Conservation and Development's (DLCD) proposed Climate and Equitable Communities rules. Damian Syrnyk, Senior Planner presented an update to the committee about the draft rules and schedule for adoption.

After discussion and an opportunity for all attendees to ask questions and provide input, the advisory board voted to request that Council write a letter in support of the rulemaking effort in anticipation of the first public hearing before the Land Conservation and Development Commission on March 31, 2022.

CAAB discussion regarding the proposed rulemaking focused on the following topics of interest for Council to consider in future public testimony related to the rulemaking effort:

- 1) The majority of CAAB voting members support the state's efforts to encourage dense, urban-scale, mixed-use, bikeable, and walkable communities and agree these rules are consistent with and supportive of the vision for Bend's Core Areas including the Bend Central District. CAAB believes the Core Area would be an ideal location to consider for Bend's first Climate Friendly Area.
- 2) CAAB members believe that these rules should be coupled with adequate resources and support to local jurisdictions to ensure that staff have the appropriate resources to meet the demands of these rules, without delaying other necessary planning needs.
- 3) CAAB members would like to ensure that affordability height bonuses are still allowed and viable in Climate Friendly Areas so that the City is still able to offer valuable incentives to encourage Affordable Housing development.

We encourage the Council to support efforts for climate friendly and equitable communities and look forward to working with Council as rules are developed and implemented.

Sincerely,

Kurt Alexander, Chair
Core Area Advisory Board



THE BUREAU OF
**PLANNING &
SUSTAINABILITY**



PBOT
PORTLAND BUREAU OF TRANSPORTATION

May 11, 2022

Land Conservation and Development Commission
Attn.: Esther Johnson, Commission Assistant
635 Capitol St. NE, Suite 150
Salem, OR 97301-8911

RE: Climate Friendly and Equitable Communities Rulemaking

Chair McArthur and Commissioners,

Thank you for the opportunity to testify on the Climate Friendly and Equitable Communities (CFEC) rulemaking process. The City of Portland appreciates the hard work done over the past many months by DLCD staff, rulemaking advisory committee members and the Commission to more strongly integrate carbon emission reduction goals into the statewide planning system.

We share some of the concerns raised by other jurisdictions about the timing and resources that will be needed to implement these strategies at the local and regional level. We ask that the Commission carefully weigh the need to address the climate emergency with the practical realities of local capacity. The Commission also should ensure that there is adequate state funding and resources to support local and regional efforts including ongoing guidance on transportation modeling and analysis as well as model codes for climate-friendly areas.

We appreciate the many revisions staff have made to the draft rules in response to concerns raised by the City of Portland and other local governments. While we support Commission adoption of the rules, we want to highlight a few areas that we believe should be changed to address local capacity and market realities or strengthened to meet the Governor's Executive Order directive that "Agencies shall exercise any and all authority and discretion vested in them by law to help facilitate Oregon's achievement of the GHG emission reduction goal." These requested changes are listed below:

Transportation Performance Standards (12-0215)

To prevent conflicts, the draft rules need to center VMT as the primary performance standard for evaluating land use and transportation plans and projects.

While we support the intent, the draft rules need to be clarified to elevate VMT reduction. By requiring the adoption of at least two performance standards (which includes mobility), the draft rules risk creating a conflict between climate friendly standards such as VMT and older, auto-based standards such as Volume/Capacity (V/C) Ratios and intersection Level of Service (LOS) assessment, with no solution proposed on what to do when these standards point in opposite directions.

Portland supports requiring adoption of transportation performance standards that equitably reduce VMT, improve safety, and increase access to and use of low carbon modes. This section should require the adoption of a primary transportation performance standard that is directly tied to greenhouse gas emissions reduction, which would avoid conflicts with the historic auto-oriented performance standard still allowed under the draft rule.

Requiring two performance standards creates an inherent conflict between the current auto-focused volume over capacity (v/c) standard and new, climate, equity, and safety standards. The rule provides insufficient consistency with the VMT/GHG targets in Division 44 and Division 12-0020, and insufficient clarity on how to resolve conflicts between multiple performance standards. This is an area where additional technical assistance and model codes are needed to establish best practices in how to move decision-making beyond auto-focused standards.

Recommendation:

We request that the Commission direct staff to prepare a rule change that would better support the intent of the Governor’s Executive Order while allowing consideration of mobility standards when it does not undermine VMT reduction by requiring application of the performance standards demonstrate they are reducing climate pollution, which is at the heart of the CFEC rule-making work.

(3) Cities, counties, Metro, and state agencies shall adopt two or more performance standards. At least one of the performance standards must demonstrate it is likely to result in support reducing climate pollution, increasing transportation choices and avoiding principal reliance on the automobile. The transportation system plan must clearly state how to apply the multiple performance standards to a proposal that meets some, but not all, of the performance standards. At a minimum, application of the performance standards must demonstrate compliance with the performance standard reducing climate pollution.

We also encourage the Commission to engage with their colleagues at the Oregon Transportation Commission to come to a shared understanding of the value of this change as they consider future changes to state and regional mobility policies and work on implementing this rule.

44-0030 (3): Projected Emission Rates

Please direct staff to clarify the intent in 44-0030 (3) of the language “Metropolitan area greenhouse gas target modeling efforts must have modeled emission rates agreed to by the Oregon Department of Transportation and the department to ensure this compliance.” Several agencies and the Oregon Modeling Statewide Collaborative have noted that Oregon’s current models do not adequately reflect “latent and induced demand” from transportation projects that add motor vehicle capacity.

Recommendation:

Please direct staff to clarify that “modeled emission rates” apply to fuel carbon intensity and vehicle technology rather than not project impacts.

12-0405 Parking Regulation Improvements and 12-0410 Electric Vehicle Charging

We are supportive of the parking requirements. However, we are concerned about the July 1, 2022, implementation date for the EV parking ratios in OAR 660-012-0012A or -0012B (5)(d). As written, this rule would immediately double (from 20% to 40%) the number of parking spaces required to provide electrical service for charging electric vehicles on July 1. We support requiring this higher ratio, but are concerned about the short

implementation date. It will create confusion having the same implementation date for two different standards – one (20%) implemented through building code and the other (40%) implemented through a state planning rule for the rollout of the BCD changes. Also, the short timeline could trigger expensive design changes for development projects that are at the end of their design process and about to file a building permit application.

Recommendation:

We recommend the electric vehicle charging requirements in Section 0410 have an implementation schedule that is the same as the other parking changes required in Section 0400 to 0450.

44-0005 (10) Delivery Vehicle GHG/VMT

With the explosion in vehicle miles travelled by delivery vehicles to households, we support the inclusion of “delivery vehicles” in calculating VMT and GHG. However, there appears to be a loophole in the definition in that it only applies to light vehicles weighing 10,000 pounds or less (OAR 660-44-0005 (10)). Medium duty delivery vehicles (such as UPS and FedEx vehicles) have as much or more mobility, safety, and climate impacts as slightly smaller package and food delivery vehicles, but would be exempt from the rule. They also have significant impacts on low-income neighborhoods which are often adjacent to arterials with high package delivery vehicle volumes. In addition, it appears that the intention of the 44-0005 (8) that defines the relevant VMT to be assessed includes “local commercial vehicle travel that is a function of household labor or demand regardless of where the travel occurs,” which would seem to clearly include household demand for goods delivered by these vehicles (as further evidenced by the examples provided in the final sentence of that subsection which explicitly includes “delivery vehicles”).

Recommendation:

We request that LCDC direct staff to include medium duty local delivery vehicles so that regional and local governments work with delivery companies to reduce delivery vehicle pollution. Specifically, we recommend adding “light and medium-duty delivery vehicles,” to the definition in 44-0005 (8) and a new definition of medium-duty vehicles in 44-0005 (10) to ensure that this growing source of GHG and VMT is evaluated.

Again, thank you for your and Department staff’s work in integrating our climate goals into the statewide planning system, and for your consideration of these requested changes. We look forward to continuing to collaborate at the state, regional and local levels to achieve these outcomes.

Sincerely,

Tom Armstrong
Housing and Economic Policy Manager
Bureau of Planning and Sustainability

Kristin Hull
Planning Division Manager
Bureau of Transportation

To: **Robin McArthur, Anyeley Hallová, Kaety Jacobson, Nick Lelack, Gerard Sandoval, Stuart Warren**
Oregon Land Conservation and Development Commission

Re: parking reforms in Climate-Friendly and Equitable Communities rulemaking

Nowhere in Oregon is there a parking space that's more important than a home or a job.

By definition, costly parking mandates currently forbid Oregonians from creating a home or a job without also figuring out how to create a parking space. They apply whether or not anyone thinks the space will eventually be used, and whether or not there is already a half-empty parking lot across the street. This mandatory overbuilding of parking induces more driving, worsens heat islands by paving fields and killing trees, and ultimately hides the costs of car trips inside the price of everything else we buy, from rent to grapes.

Some parts of Oregon, like the Tigard Triangle, have already made parking spaces optional. This hasn't interfered with the construction of additional parking there -- which is good, because many Oregonians do need to own vehicles and drive. What this reform does is let project managers decide on the amount of parking that's right for their project. This removes an obstacle to equitable, climate-friendly investments like affordable housing and neighborhood-scale, walkable retail. Giving Oregonians the option to build less parking, if they're able to figure out how, creates direct financial incentives for employers to boost transit commuting, or to make use of existing parking spaces that currently sit unused nearby.

Wherever parking is mandatory, such incentives do not exist. Our society and our planet desperately need them to.

In its CFEC rulemaking, the Department of Land Conservation and Development proposes many reforms that would lead to cleaner, greener, and less expensive cities. Some of the proposals are quite complicated and could benefit from local information and discussion – especially in cases where, as in Metro's jurisdiction, some related performance goals are on track.

The proposed parking reforms are not among the complicated cases. The “choose your own adventure” structure proposed by DLCD allows jurisdictions to pursue complicated, nuanced options if they prefer. But proposed rule 0420(1) wisely gives jurisdictions the option to keep it simple.¹ A red pen to simply strike costly, inequitable, energy-hungry parking mandates from local codes costs \$1.75 at Fred Meyer.

As LCDC looks for ways to balance the needs of local governments against the orders of the governor and the needs of the people of Oregon and the planet, we applaud the current approach to parking reform. We urge you to keep these proposed parking reforms on a fast track to approval, without geographic exceptions or delays, throughout the state's largest MPOs.

¹ "Cities and counties that adopt land use regulations that do not include parking mandates are exempt from OAR 660-012-0425 through OAR 660-012-0450."

1000 Friends of Oregon
 350 Eugene
 Asian Pacific American Network of Oregon
 Beaverton Downtown Association
 Bend Bikes
 Bend YIMBY
 BRIDGE Housing
 Better Eugene-Springfield Transportation
 Better Housing Together
 Bienestar
 Business for a Better Portland

Catholic Charities of Oregon/Caritas Housing
 Central Oregon Landwatch
 Community Partners for Affordable Housing
 Depave
 Families for Climate
 Hillsboro Downtown Partnership
 Home Forward
 Innovative Housing, Inc
 OPAL Environmental Justice Oregon
 Oregon Chapter Sierra Club
 Oregon Environmental Council

Oregon Walks
 Parking Reform Network
 Portland Audubon
 Portland Housing Center
 Portland: Neighbors Welcome
 ROSE Community Development
 REACH Community Development
 Sightline Institute
 Springfield-Eugene Tenant Association
 The Street Trust
 Sunrise PDX
 Urban Greenspaces Institute
 Verde





May 16, 2022

TO: Oregon Land Conservation and Development Commission

Submitted Electronically to esther.johnson@dlcd.oregon.gov

RE: May 19, 2022 Commission Meeting; Agenda Item 2; Climate-Friendly and Equitable Communities Rulemaking Public Hearing

Dear Chair Robin McArthur, Vice-Chair Anyeley Hallová, and Members of the Commission:

The Oregon Chapter of the American Planning Association (OAPA) asks the Commission to adopt the proposed Climate Friendly and Equitable Communities (CFEC) rules at the conclusion of your May 19 public hearing. We also ask that the Commission select option 0012A: *Effective Dates and Transition Period [More Urgent Option]* with a few clarifying suggested changes outlined below.

OAPA is a nonprofit membership organization of over 800 planners that works to create sustainable and vibrant Oregon communities through professional development; advocacy for sound planning; providing resources to meet the challenges of growth and change; and embracing and promoting diversity, inclusion and equity. OAPA has been pleased to support this rulemaking effort and to have been represented on the Rules Advisory Committee (RAC).

Climate change presents risks to Oregon’s natural environment, people, and infrastructure. Addressing these risks means taking steps to reduce greenhouse gas emissions and to limit exposure and vulnerability to climate hazards.

This rulemaking is an important step to take. When implemented, the rules will transform how Oregon’s metropolitan communities and transportation infrastructure are planned, organized and built, leading to communities that allow many people to choose to walk, bike, use transit, or drive shorter distances using safe and equitable transportation systems as they go about their daily lives. Importantly the rules will require equitable participation and outcomes as jurisdictions’ revised their comprehensive plans and update their Transportation System Plans when implementing the rules.

Adopting the rules **now** reflects the urgency of needing to take action that has underpinned the CFEC rulemaking effort. Additionally adopting the rule changes now acknowledges the years of work that have led to these rules.

As was explained during the first RAC meeting, the CFEC rulemaking is a step in a process to implement State legislation passed in 2007, 2009 and 2010 that directed action to reduce greenhouse gas emissions in Oregon’s metropolitan areas.

In the intervening years:

- Metro did scenario planning and adopted a Climate Smart Communities Strategy which was then approved by the Commission (2015). That work validated the need of key concepts of the proposed TPR amendments: mixed-use walkable areas; parking reform; accessible transit and the development of safe and high quality pedestrian and bike systems.
- The STS was adopted.
- The Commission (2016) appointed an advisory committee to make recommendation regarding GHG emission reduction targets and updating the TPR and adopted new reduction targets.
- The Commission initiated (2017) Division 12 rulemaking and appointed a RAC. The RAC meet 6 times and developed recommendations. The work was paused in 2018.
- In 2020 the Governor’s Executive Orders on Climate and Equity were issued and the Commission intimated the CFEC rulemaking and appointed the RAC.

The agency staff has well documented the robust engagement process that has occurred since the Commission initiated in CFEC rulemaking in September 2020. **The time is now to adopt the new updated rules.**

ADDITIONAL RECOMMENDATIONS

Effective Dates

OAPA recommends that the Commission **adopt the effective date 12A option**. OAPA also recommends that the Commission clarify that the alternative dates **June 31, 2027 effective date (3)(b)** and **December 31, 2029 effective day for adoption of a major transportation system plan update (4)(a)** be hard dates and not subject to (3)(h) that allows the Commission to “modify alternative dates at any time as necessary to achieve the purposes of this division”.

The expectations laid out by the Commission was to “take action with a sense of urgency with the rules to apply as quickly as is reasonable.” Option 12B fails this charge and should not be considered.

We do feel that the effective dates found in 12A(4) best reflect urgency and are reasonable. As noted in our [testimony](#) for your March 31 hearing, OAPA is not sure that the alternative dates process is needed, especially with the dates in (4) but we understand it is an option some jurisdictions may want.

We recommend that if the alternatives date option goes forward that in no case may the adoption effective dates go longer than June 31, 2027 or December 31, 2029 for TSPs. Anything longer does not reflect urgency and that it is more than reasonable to expect jurisdictions to make the needed changes within these timeframes.

Clarifying Amendments

OAPA’S March 31 [testimony](#) had a small number of recommended changes some of which are addressed in the May 5 draft rules and other that were not. We understand that difficulty of writing rules that satisfy all parties. We do ask the Commission, during the hearing, to state the **need both the Commission and Department to be engaged and willing to consider changes, make clarifying amendments, and address issues that may not have come up or been addressed during the rulemaking process.**

Resources

Although funding and resource support is not part of what the Commission will be adopting OAPA feels that it is important that the Commission emphasize the importance of resourcing jurisdictions and that urgency to implement the adopted rules should not only be expected of the local jurisdictions but also the executive and legislative branches. OAPA was heartened to learn that \$15M will be available to assist in updating TSPs.

OAPA would, again, like to commend the Commission and staff as well as the RAC members for all the hard work, energy and critical thinking that has resulted in the draft rule. We look forward to the Commission adopting the rules so that we can begin the critical work of local implementation.

OAPA thanks the Commission for its time and consideration of this testimony.

Sincerely,



Aaron Ray, AICP, President
Board of Directors



Jonathan Harker, AICP
CFEC RAC OAPA Representative



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To: Land Conservation & Development Commission
From: Mary Kyle McCurdy, Deputy Director
Date: May 19, 2022

Re: Climate Friendly & Equitable Communities Rulemaking

On behalf of 1000 Friends of Oregon, I thank you for your diligent, long, and thoughtful attention to what is likely the most important rulemaking any of you undertakes while on the Commission. You have dug in and read everything; attended the many advisory and public meetings and forums on this over the years; and ensured that the public engagement for this process was broad and diverse.

In particular, I want to thank Commissioner McArthur. Adopting rules to integrate land use and transportation planning to mitigate climate change has been an effort that has gone on for every year of her Commission service, and her background in planning and transportation planning in particular has been essential to getting us here today. It is fitting that the rulemaking phase be concluded at this meeting, for many reasons, including that we are coming to the end of Commissioner McArthur's service.

We support the Commission adopting the Option A version of the proposed rules today. While we would like to see the rules be stronger in some places and implemented sooner (summarized below), it is past **time to adopt these rules**. And that is clearly the message you have been receiving, from tens of thousands of Oregonians. We are part of a coalition of community-based organizations who represent diverse Oregonians from around the state, who have submitted supportive and constructive written testimony on these rules, and who want you to adopt these rules now. This includes Bend Bikes, Central Oregon LandWatch, The Environmental Center, Oregon Environmental Council, Better Eugene-Springfield Transportation, Oregon League of Conservation Voters, and over 1,500 businesses, organizations, and Oregonians who signed onto a letter of support (see exhibit 78).

Throughout this process we've worked with local jurisdictions, including submitting a joint letter with the League of Oregon Cities asking that you delay adopting these rules from March to May 2022, to provide more time for analysis and revisions. We know local governments need funding to do much of this work, and we have pressured ODOT and the OTC to provide more funding. DLCD and ODOT now have more than \$18 million to assist with implementing the rules. We are committed to continuing to work with local governments and the state to secure more funding. But that can only happen if these rules are adopted today.

As you well know, 1000 Friends and those we work with have clearly compromised the time frames and standards we would like to see in these rules. The draft rules represent a delicate

balance between urgency and implementability, achieved over many years of discussions, negotiation, and compromise. Anything short of adoption today puts this delicate balance in jeopardy and runs the real risk that nothing happens. And that will be a tragic outcome for Oregon - especially for future generations who expect and deserve much more from us. It is time to move forward.

We have submitted joint comments with other organizations and individuals. I will focus here on three points in the draft rules for your consideration.

1. Affordable Housing & Anti-Displacement Measures in CFAs

We support the proposed change to OAR 660-012-0315(6)(d), that we and affordable housing advocates requested, to ensure that affordable housing and anti-displacement strategies are incorporated into planning and implementing the Climate Friendly Areas (CFAs). It is not enough to simply say that CFAs should be places where housing affordable to those of moderate and lower incomes is maintained and enhanced, and where potential displacement is mitigated – that commitment must be baked into these rules.

2. Designating and Planning CFAs

The Climate Friendly Areas are the building blocks for ensuring that the rules accomplish the climate goal of reducing the need to drive through equitable, healthy, affordable, walkable, mixed use neighborhoods. Therefore, it is critical that these rules:

- **Keep the June 2023 deadline for completing the study of possible CFA areas** as proposed in Option A (660-012-0012(5)(b), Option A).
- **Keep the December 2024 deadline for CFA designation and adoption of CFA locations and land use requirements.** (660-012-0012(4)(c), Option A). Significantly, this task is where the implementation of the affordable housing & anti-displacement strategies would occur, and it is crucial for their success that these strategies get implemented as early as possible. Your *Housing Production Strategies* report highlights this (emphasis added):

“They [specific strategies] are needed *immediately and persistently* by groups that are vulnerable in the housing market. These strategies directly produce or protect affordable housing, especially for communities of color and other protected class communities. They have strong impacts for anti-displacement that can be seen in the short-term.”

- **Eliminate the ability to extend this CFA designation 2024 date**, which the rules currently allow in two ways. In both Options A and B, the work plan path allows this date to be extended to 2027 (660-012-0012(3)(b)) and the blanket extension path allows an indefinite extension (660-012-0012(3)(h)).

- Clearly provide that the **land use assumptions** about future development, required by OAR 660-012-0340, **be adopted with the CFA designation, in 2024**. As the staff describes, these land use assumptions are a critical component of the rest of the work required by these rules, because they “are used to help make coordinated land use and transportation plans.”

3. NACTO Standards

To ensure that bicycle systems are designed for all ages and abilities, the Bicycle System Requirements should reference *only* the NACTO Urban Bikeway Design Guide (2nd Edition) and Designing for All Ages & Abilities (December 2017) as safe harbors under this section. If it is necessary to reference an ODOT document, then ODOT's guidelines should be limited to state highways where ODOT has jurisdiction.

To: Land Conservation & Development Commission
From: Mary Kyle McCurdy, Deputy Director, 1000 Friends of Oregon
Date: May 17, 2022

Re: A Brief History of the Legislative and Executive Direction for Climate Friendly & Equitable Communities Rulemaking

A. Governor's Advisory Group on Global Warming (2004)

In 2004, Gov. Kulongoski appointed the Governor's Advisory Group on Global Warming, which issued the "Oregon Strategy for Greenhouse Gas Reductions."¹ Among its recommendations were these, relevant to land use:

- Integrate land use and transportation decisions with greenhouse gas consequences.
- Reduce wildfire risk by creating a market for woody biomass from forests.
- Consider GHG effects in farm and forest land use decisions.

B. Legislatively-Adopted Greenhouse Gas Emission Reduction Goals (2007)

In 2007, the Oregon Legislature adopted goals for the state to meet in reducing its total greenhouse gas emissions from all sources:

By 2010: Arrest the growth in GHG emissions
By 2020: GHG reduction of 10% below 1990 levels
*By 2050: GHG reduction of 75% below 1990 levels.*²

C. Oregon Global Warming Commission (2007)

In 2007, the Oregon Legislature also implemented parts of the Governor's Advisory Group on Global Warming report by passing HB 3543,³ which created the Global Warming Commission (GWC). In creating the GWC, the Legislature described at length the scientific underpinnings of

¹ https://oregonexplorer.info/data_files/OE_topic/hazards/documents/GWReport-Final.pdf

² "ORS 468A.205 Policy; greenhouse gas emissions reduction goals. (1) The Legislative Assembly declares that it is the policy of this state to reduce greenhouse gas emissions in Oregon pursuant to the following greenhouse gas emissions reduction goals:

(a) By 2010, arrest the growth of Oregon's greenhouse gas emissions and begin to reduce greenhouse gas emissions.

(b) By 2020, achieve greenhouse gas levels that are 10 percent below 1990 levels.

(c) By 2050, achieve greenhouse gas levels that are at least 75 percent below 1990 levels."

<http://www.oregonlaws.org/ors/468A.205>.

³ See full bill at <https://olis.leg.state.or.us/liz/2007R1/Downloads/MeasureDocument/HB3543>

climate change, its adverse impact on the Oregon environment and economy, and the urgent need to address it,⁴ concluding:

“There is a need to assess the current level of greenhouse gas emissions in Oregon, to monitor the trend of greenhouse gas emissions in Oregon over the next several decades and to take necessary action to begin reducing greenhouse gas emissions in order to prevent disruption of Oregon’s economy and quality of life and to meet Oregon’s responsibility to reduce the impacts and the pace of global warming. “

In 2010, the GWC issued its *Roadmap to 2020*⁵, which makes recommendations for how Oregon can meet its 2020 GHG reduction goal and stay on the road to meet its 2050 reduction goal. The recommendations included:⁶

- “Include carbon generated by local transportation and land use decisions in the community planning process.
- Incorporate meeting Oregon’s GHG reduction goals into State transportation and land use planning.
- Redesign neighborhoods so schools, services, and shopping are easily accessible by walking, biking or transit.
- Make public transit more convenient, frequent, accessible, affordable.
- Transport more freight by rail, less in trucks.
- Align forest management practices to reduce and store carbon, e.g., conservation harvest, fire management.

⁴ “In partnership with the Governor’s advisory group, 50 scientists signed the ‘Scientific Consensus Statement on the Likely Impacts of Climate Change on the Pacific Northwest,’ which examined the potential effects of climate change on temperature, precipitation, sea level, marine ecosystems and terrestrial ecosystems.

Global warming poses a serious threat to the economic well-being, public health, natural resources and environment of Oregon.

Oregon relies on snowpack for summer stream flows to provide energy, municipal water, watershed health and irrigation. Also, a potential rise in sea levels threatens Oregon’s coastal communities. Reduced snowpack, changes in the timing of stream flows, extreme or unusual weather events, rising sea levels, increased occurrences of vector-borne diseases and impacts on forest health could significantly impact the economy, environment and quality of life in Oregon.

Oregon forests play a significant role in sequestering atmospheric carbon, and losing this potential to sequester carbon will have a significant negative effect on the reduction of carbon levels in the atmosphere. (6)

Global warming will have detrimental effects on many of Oregon’s largest industries, including agriculture, wine making, tourism, skiing, recreational and commercial fishing, forestry and hydropower generation, and will therefore negatively impact the state’s workers, consumers and residents.

⁵ <https://www.keeporegoncool.org/roadmap-to-2020>

⁶ <https://static1.squarespace.com/static/59c554e0f09ca40655ea6eb0/t/59f7882b0852294c3116c904/1509394479640/OGWC-Roadmap-Propositions.pdf>

- Align agricultural practices with carbon reduction and storage...”

D. Jobs and Transportation Act (2009)

Starting in 2009 with the Jobs and Transportation Act,⁷ and related legislation,⁸ the Legislature required the Portland area metropolitan planning organization (MPO), Metro, to develop and adopt a land use and transportation scenario (“scenario plan”) that reduces GHG emissions from cars and light trucks to meet the region’s fair share target of the statewide GHG reduction goal. The Legislature also required the Central Lane MPO to develop a land use and transportation scenario plan that would meet its GHG target, but did not require the plan to be implemented.

In addition, an interim work group was appointed by the Senate President and House Speaker, and co-chaired by Gail Achterman & John Van Landingham, the then chairs of, respectively, the OTC and LCDC.

E. SB 1059 (2010)

That interim work group developed a legislative recommendation that became SB 1059. Passed in 2010, SB 1059 requires:⁹

- The LCDC and the OTC to provide policy leadership and funding to enable the state’s eight major urban areas to develop and implement land use and transportation scenario plans to reduce GHG emissions by reducing driving. *Ongoing.*
- LCDC to adopt GHG reduction targets for the major urban areas. *Completed; LCDC updated GHG targets for each MPO in 2016.*
- ODOT to “...after consultation with and in cooperation with [MPOs], other state agencies, local governments and stakeholders... adopt a statewide transportation strategy [STS] on greenhouse gas emissions to aid in achieving the greenhouse gas emissions reduction goals set forth in [statute].”¹⁰ *Completed; the STS is adopted..*
- ODOT to develop a computer-modeling program to forecast the likely GHG emissions from various land use and transportation variables. *Completed.*
- DLCD and ODOT to develop scenario planning guidelines and a GHG reduction toolkit. *Completed.*
- The bill funded Metro to *start* this process, by developing and then implementing a land use and transportation scenario plan that meets the GHG reduction target set for the Metro region. *Completed.* Metro is now implementing an integrated land

⁷ HB 2001, sections 37–39, <http://www.leg.state.or.us/09reg/measpdf/hb2000.dir/hb2001.en.pdf>.

⁸ HB 2186, section 10, <http://www.leg.state.or.us/09reg/measpdf/hb2100.dir/hb2186.en.pdf>.

⁹ SB 1059. See ORS 468A.200, et seq, <https://olis.leg.state.or.us/liz/2010S1/Measures/Overview/SB1059>.

¹⁰ The OTC adopted the Statewide Transportation Strategy in 2018 https://www.oregon.gov/ODOT/TD/OSTI/docs/STS/STS_FAQ.pdf.

use and transportation plan that will meet the region’s transportation-related GHG reduction target.

- The Central Lane urban area (Eugene/Springfield) was also funded to develop a complying plan, but was not required to. Central Lane *completed* the planning but to date has *not adopted* it.
- Each of the eight major urban areas must “Consider how regional transportation plans could be altered to reduce greenhouse gas emissions.”¹¹ *Incomplete*. Only Metro has done this.

F. Gov. Brown Climate Change Executive Order and Governor Brown’s Letter to LCDC

On September 23, 2019, Governor Brown sent a letter to LCDC and three other state agencies and their commissions (ODOT and the departments of Environmental Quality and Energy). Among other things, the Governor reminded DLCD and ODOT that they are climate change agencies, and should “prioritize implementation” of the State Transportation Strategy to Reduce GHG Emissions (STS),¹² including through amending the Transportation Planning Rules (TPR) to reflect transportation-related GHG emissions reduction goals.

On March 19, 2020, Governor Brown issued Executive Order 20-04,¹³ on climate change. Among other things, the EO directs LCDC and the OTC to carry out the direction the legislature gave to the two agencies in the above-described legislation. The EO directs LCDC and OTC to:¹⁴

“prioritize implementation of the Statewide Transportation Strategy”

“[e]stablish [] GHG emission reduction performance metrics”

“[a]mend [] the Transportation Planning Rules [to] direct changes to the transportation plans of metropolitan areas to meet GHG reduction goals.”

The Governor directed LCDC to “prioritize and expedite” amending its transportation planning rule to ensure that the state’s eight major urban areas make changes to their transportation plans to meet GHG greenhouse gas reduction goals that have been assigned to them, ***pursuant to legislative direction, for almost a decade***. The Governor further directs LCDC and ODOT to provide these local governments, from the agencies’ existing funding, the financial and technical assistance to carry this out.

¹¹ ORS 184.899(2)(b).

¹² https://www.oregon.gov/odot/Planning/Documents/Oregon_Statewide_Transportation_Strategy.pdf

¹³ Gov. Brown Executive Order No. 20-04 (Climate Change.) The Executive Order (EO) sets out science-based goals of GHG emission reductions of 45% below 1990 levels by 2035 and 80% below 1990 levels by 2050, and gives specific direction to 16 state agencies on actions each should take to reduce GHG emissions or store carbon. <https://drive.google.com/file/d/16islO3GTqxVihqhhLcjGYH4Mrw3zNNXw/view>

¹⁴ EO, para. 9, p. 12.

The Bulletin

Central Oregon is ready for climate-friendly and equitable communities

March 13, 2022

Ben Gordon, Executive Director of Central Oregon LandWatch

Today's biggest contributors to climate change are tied to our built environment. Where we live and work and how we travel determine our impact on this planet. Greenhouse gas emissions from transportation are the biggest contributor to climate change nationally. That certainly rings true for Oregon, where transportation accounts for 40% of statewide emissions.

Established in the 1970s, Oregon's land use system was created to channel growth and development within city limits to prevent sprawl onto our surrounding farm lands and open space. We didn't know then that this land use system would also be one of our best tools for tackling climate change.

By thoughtfully guiding growth, Oregon has been able to develop more compact neighborhoods that reduce major carbon emitters, like vehicle miles traveled.

But we need to do more to meet this moment. As we continue to experience ongoing drought and rapid regional growth, land use planning is critical to creating a hopeful future where equity and sustainability go hand in hand.

Right now, we have a once-in-a-generation opportunity to transform our communities and tackle climate change head-on.

Oregon's Land Conservation and Development Commission (LCDC) is in the midst of a Climate-Friendly and Equitable Communities rulemaking process. These rules will guide future development for cities across our state with a goal "to transform Oregon's communities to be safe, equitable, sociable, and pleasant places where driving is not required, and the amount of driving is reduced."

This could be a seismic shift from business-as-usual by placing climate change, affordable housing, and equitable transportation choices at the center of how our cities are planned, built, and funded. For instance, these rules would designate Climate-Friendly Areas in our cities and direct a portion of new housing development to those areas — and these rules would also direct cities to prioritize abundant, high-quality infrastructure projects for biking, walking, and public transit in those areas.

The very first goal of Oregon's land use system is public involvement, and this process has already included thousands of Oregonians.

LandWatch and other local groups have been deeply engaged in this effort to help ensure these rules are strong and effective and that they happen soon. We don't have another decade to wait.

We know local jurisdictions will need support and resources to accomplish the vital work ahead. On March 31, there is a virtual public hearing on these rules on LCDC's website (oregon.gov/lcd/Commission) and comments can be submitted up until then. Central Oregonians need to show up to ensure this effort leads to transformative outcomes that change how our cities are built and how state transportation dollars get spent in our local communities.

At its heart, the Climate Friendly and Equitable Communities rulemaking process should add up to one necessary outcome: all people should have the opportunity to thrive here in Central Oregon while we protect the environment around us.

That is why these rules need and deserve our community's attention and support.

If you share LandWatch's urgency in tackling climate change at the state and local level, join us at the virtual public hearing on March 31. Now is the time to make your voice heard about the future you want to see.

https://www.bendbulletin.com/opinion/guest-column-central-oregon-is-ready-for-climate-friendly-and-equitable-communities/article_460f4410-9ff5-11ec-8676-f705917ece4e.html

The Bulletin

Let's build more affordable, livable communities in Central Oregon

April 11, 2022

Ariel Méndez, Board Chair of Bend Park & Recreation District

Imagine living in a neighborhood where you're a 15-minute walk or bike ride from all your daily needs — work, shopping, school, etc. Bend's Comprehensive Plan calls them "complete communities."

This kind of development gives people attractive options for leaving their car at home, reducing household costs while making our city healthier, safer, and more livable.

Right now, the typical Deschutes County household can expect to pay about \$2,000 more over the next year thanks to higher gas prices. We are already spending over a quarter of our household income on driving. And driving rates as the number one source of greenhouse gas emissions as well as a primary cause of death and serious injury for all age groups. This really hurts because most people feel they have no option but to drive for most trips.

But there's good news on the horizon. The state's climate friendly and equitable communities rules, coming as early as next month, will accelerate the growth of Bend's "complete communities" and make it easier for more people to walk and bike when they want to.

So how will we get that done? Presently, master planning is one way to accomplish our goals. A master-planned community aims to share infrastructure costs, place amenities nearby, and provide housing options at a variety of price points. This helps create mixed-income neighborhoods that also tend to be more diverse with more equitable public services.

In Bend, we have several examples of master-planned communities. NorthWest Crossing was a master-planned community begun in the 1990s. Petrosa in northeast Bend is

another master-planned community that began construction in 2021. The city of Bend recently completed planning for a community in southeast Bend. (When the city leads the planning, it is known as an area plan instead of a master plan.)

Done well, master-planned communities can provide a variety of housing options with things like retail, schools, and parks nearby — with a way to walk or bike to them if you choose to! For example, Pacific Crest Middle School, constructed in 2015 as part of the NorthWest Crossing master plan, connects to miles of off-street trails and has become famous for its students who ride bikes year-round.

Master planning may not be a panacea, but there are real risks to developing large projects without it. For example, High Desert Middle School in southeast Bend was completed in 1993 without an area or master plan. Today, almost three decades later, it remains surrounded by 45 mph roads, incomplete sidewalks, and no safe crossings, and it suffers massive traffic and sometimes even crashes at pick-up and drop-off times. Several years ago, the school installed a raised crosswalk in the parking lot after a driver struck a girl so hard it broke her hip.

Sticking to our plans to build these safer, more convenient “complete communities” allows us to spend less on transportation and makes our city more livable. But it also means sometimes we have to say no to projects that are incompatible with those plans.

I suspect this was on the minds of Bend city councilors when they were asked to consider changing city land use laws for the Deschutes Public Library’s costly central library and performing arts center off U.S. Highway 20 north of Bend. Personally, I’m grateful that council decided to protect the integrity of our development code and comprehensive plan. I hope the library board comes back with a better approach that supports, not undermines, our city’s plans and goals.

Bend still has a great opportunity to grow in a way that doesn’t sacrifice safety and the climate, while lowering the cost of living and further improving our great quality of life. Good alternatives to driving mean less time at the pump and healthier, more livable community for us all.

https://www.bendbulletin.com/opinion/guest-column-lets-build-more-affordable-livable-communities-in-central-oregon/article_0882107e-b9bc-11ec-8b86-e70d7f88a2b0.html

The Bulletin

Bold CFEC rulemaking is needed to address climate change

May 4, 2022

Mark Molner

Oregon's Land Conservation and Development Commission is currently creating a framework for new and existing transportation and urban planning in Oregon's eight largest municipal regions, which includes Bend, to meet the state's climate pollution reduction goals. In his recent guest column from April 11th, Ariel Méndez of the Bend Park & Recreation District board cited the importance of the forthcoming Climate-Friendly & Equitable Communities rules for making Central Oregon more livable.

This framework can promote density rather than sprawl to decrease dependency on cars, thereby reducing greenhouse gas emissions along with the benefit of reduced traffic and congestion. Well-planned infrastructure, public transportation alternatives, biking and walking paths, multi-use building zones that allow people to live nearer to where they work, and other methods can all be part of a solution. Urban planning objectives that reduce carbon emissions contribute to a more livable urban environment.

I urge Oregon's Land Conservation and Development Commission to adopt rules that are strong, clear, and timely enough to meaningfully address climate change and its impacts on our communities. This includes deadlines for Transportation System Plan updates, incorporating National Association of City Transportation Officials (NACTO) standards for bike network design, implementing affordable housing and anti-displacement strategies, and setting block lengths that are conducive to walkable, mixed-use neighborhoods.

If you want the state to take bold action on addressing climate change, write to DLCD.CFEC@dlcd.oregon.gov before May 12th and express your support for strong and urgent Climate-Friendly and Equitable Communities rules.

https://www.bendbulletin.com/opinion/letters-to-the-editor-vote-for-jamie-mcleod-skinner-a-politically-motivated-leak-comment-on/article_a09bf370-cbcd-11ec-9c79-7bd24b5fbf58.html

The Bulletin

New state environmental rules will change how Oregonians live

May 13, 2022

Bulletin Editorial Board

The Legislature was likely to have been Gov. Kate Brown's best friend. It was controlled by her fellow Democrats.

But it wasn't on climate legislation. Republicans walked out to block what she and many of her fellow Democrats had in mind. Brown responded with an executive order. And next week, key climate rules for transportation and growth are expected to be adopted by the state.

They are powerful changes to how Oregonians live and get from place to place. Some of them build on trends that are already in state rules. Some of it is new. If you like the proposal or don't, now may be your last chance to comment on them.

The proposal changes how cities over 10,000 can grow. They must plan for what are called climate friendly zones to accommodate at least 30% of their housing needs. What does that really mean? It means more dense development. More growing up than out.

You aren't going to be yanked out of your car. But there is a big shift coming in prioritization away from passenger cars. Transportation will be required to be more oriented toward pedestrians, bikes and transit. It will be harder to find a place to park and easier to find a charger for an electric vehicle. Local streets will be narrow and slow. New city plans for transportation will have to have the goal of reducing car trips.

If you like to bike, the rules may make things better for you. The bicycle system will have to satisfy most travel needs under 3 miles. There are more requirements for bicycle parking. Will there be wide, protected bike lanes enabling bicyclists to get where they need to go without having to worry about getting whacked by a car and bike lanes that will be cleared of snow? The rules don't seem to go that far.

Another important priority is to ensure growth or transportation plans are done equitably. Plans have to be reviewed through an equity lens. The question is if the more intense development may spur gentrification, despite any equity review.

Will these proposed rules lead to a more climate friendly Oregon? It would seem so.

Will it make housing more affordable? That's difficult to answer. Supporters would say yes in the long run because the rules are aimed at being climate friendly.

Will it make more housing of the kinds Oregonians want available? Homebuilders are concerned it will not create the housing mix people look for and will put more pressure on prices for single-family homes.

Will cities get enough financial support from the state to easily transition to all the new requirements? We will see.

ENERGY NEWS NETWORK

Oregon must take action to stay in the race to cut emissions

May 17, 2022

Meredith Connolley

Shelley Wenzel

No matter what happens with federal climate progress, state climate action is imperative to cut greenhouse gas (GHG) emissions and help achieve the United States' commitment to the Paris Agreement. Outside the media spotlight, Oregon has adopted some of the nation's most significant climate policies, recently finalizing rules to slash emissions from fossil gas and transportation, while targeting 100 percent clean electricity by 2040.

But new research shows the state won't achieve its climate goals without coupling power sector progress with additional policies that get vehicles, buildings, and industry off fossil fuels. In short, the winning climate playbook for all leading states must be "clean the grid and electrify everything."

In 2020, Governor Kate Brown enacted an Executive Order (EO) to set a statewide goal of cutting greenhouse gas pollution 45 percent by 2035 and 80 percent by 2050. The same EO led to increased transportation electrification, cleaner fuels, and a Climate Protection Program (CPP), which sets emissions caps for transportation fuels and fossil gas.

And last year, Oregon's legislature passed the fastest 100% clean electricity target in the West, requiring the state's largest utilities slash emissions from power generation 80 percent by 2030 and 100 percent by 2040.

Even with these successes, Energy Innovation modeling shows the state is off track for reaching its own goals: If all recently adopted policies are rigorously implemented, Oregon would still only cut emissions 60 percent by 2050.

But there's good news. The modeling also finds that adopting additional policies – especially for transportation and buildings – would not only cut emissions by 75 percent,

but would also boost statewide GDP by \$4 billion, create 18,000 jobs, and prevent nearly 900 asthma attacks annually in 2050.

Oregon's emissions trajectory

Examining statewide GHG sources illuminates why a broader set of policies in Oregon, along with a pathway for how they will be achieved, is needed. As with most of the U.S., transportation has surpassed the power sector as the largest greenhouse gas source, composing 35 percent of all emissions. Meanwhile, homes and buildings consuming power and gas make up the second largest source at 34 percent, followed by industry and agriculture at 10 percent each.

With Oregon's population expected to hit almost 4.6 million by 2030, these emissions will trend upward unless policies to shift from fossil fuels to clean electrification start right away. Every new gasoline car or truck, every new gas furnace and new gas-heated building or home locks in emissions for decades. Without meaningful progress in these other sectors, the state won't hit its 2050 climate goals.

What's next for Oregon—and other leading states

The Oregon policy modeling used the Energy Policy Simulator, a tool created in collaboration with Power Oregon and the Green Energy Institute, to evaluate the state's new 100% clean electricity by 2040 law and the Climate Protection Program, finding they get Oregon much closer but still fall short of the state's 80 percent reduction by 2050 goal. The open source, peer-reviewed EPS estimates the emissions, jobs, and health impacts of climate and energy policies using federal and state data.

The Oregon EPS research modeled a set of broader climate policies for all sectors that would put the state on track to achieve its goals and align with the U.S. Nationally Determined Contribution (NDC) to the Paris Agreement (i.e., Oregon doing its proportional fair share). The findings show an "NDC Scenario" for Oregon would avoid \$4.8 billion in climate and health costs in 2050 (on top of the \$4 billion in GDP growth).

Oregon is in a perfect position to adopt additional policies that leverage its clean electricity sector to secure compounding emissions reductions across the economy through efficiency and electrification policies. And state policymakers must ensure the clean energy

transition's health and economic benefits are broadly shared and reach frontline communities hit the hardest by pollution and climate impacts.

First, Oregon should adopt a 100 percent all-electric new vehicles sales standard by 2035, paired with an EV subsidy lasting through 2030, to supercharge transportation electrification. These policies must be accompanied by EV charging investments to plug in rural areas, low-income communities, and trucking corridors.

Second, increased investments in public transportation, as well as safe walking and biking paths, would reduce emissions while improving equity and air quality. An expansion of the state's Clean Fuels Program could further cut emissions as the state moves toward a zero-emission future. These transportation sector policies achieve nearly one quarter of all the reductions under the NDC Scenario, showing how vital they are to reaching Oregon's climate goals.

Third, Oregon must phase out fossil fuels for indoor uses. Similar to Washington's recently passed commercial and large multi-family building heat pump requirement, the NDC Scenario modeling finds the most important policy for cutting greenhouse gas emissions from buildings would be a building code or standard requiring all new buildings or building equipment to be electric by 2030. This policy alone achieves over 10 percent of all the NDC Scenario's reductions. To be most impactful, this transition must be coupled with strong efficiency standards.

These policies also create other health and economic benefits. Transportation electrification, along with greater reliance on active transportation, cuts health-damaging particulate and NOx emissions. Electric vehicles are also cheaper to own and maintain than gas cars and protect drivers from volatile oil prices. Electric heat pumps for space or water heating are more efficient than their fossil gas burning counterparts, and electric or induction stovetops avoid harmful fumes from gas cooktops that experts say may cause childhood asthma symptoms.

Together, a broader set of policies like those included in the modeling would get Oregon within a couple percentage points of the state's 2050 emissions reduction goal, while additional land use and climate-smart agricultural practices could make up the difference. Equitable policy design and planning that prioritizes access and affordability for low-income households and communities will ensure the benefits are enjoyed by all residents, not just the wealthy.

The key takeaway

While transitioning the power grid to 100 percent clean electricity is a critical step, Oregon's lesson is that state climate action can still fall short if that isn't coupled with rapid electrification. Cutting power sector emissions alone will not solve climate change, but it can make a big difference and leverage clean electricity to secure urgently needed emissions reductions in the transportation, buildings and industrial sectors. If we equitably and rapidly electrify as we clean up our grid, more of our cars and homes will be emissions-free, hopefully in time to avoid climate catastrophe.

https://energynews.us/2022/05/17/commentary-oregon-must-take-action-to-stay-in-the-race-to-cut-emissions/?utm_source=Sightline%20Institute&utm_medium=web-email&utm_campaign=Sightline%20News%20Selections

Oregon Capital Chronicle

Land use policy, cautious investments could help Oregon weather economic uncertainty

March 22, 2022

Julia Shumway

Conservative investments and decades of policies aimed at reducing dependency on cars could insulate Oregon from the worst effects of an economic crisis sparked by Russia's invasion of Ukraine, but state leaders and their advisers say much is still uncertain.

The state and national economy rebounded rapidly after the initial shock of the Covid pandemic and widespread shutdowns in 2020. Higher wages and more business transactions boosted Oregon's tax revenue so much higher than anticipated this year that state legislators had a surplus to spend this session.

They had budgeted more than \$25 billion for the two-year budget cycle that ends in July 2023. They ended up with more than \$1.4 billion extra. Oregonians are likely to receive large rebates on their taxes in two years because of a state law that sends money back to taxpayers if tax collections exceed the amount budgeted.

However, inflation was hitting Oregonians hard before Russia invaded Ukraine, and it's likely to get worse. A report from state economists in February noted that inflation-adjusted wages have declined for most workers, with inflation at a 40-year high in the U.S.

After Russia invaded Ukraine, gas prices skyrocketed. That has ripple effects on other commodities that travel by truck at some point.

Gov. Kate Brown told the Capital Chronicle she expects to meet soon with her council of economic advisers to talk about the war in Ukraine and potential impacts on struggling Oregon families. She believes recent legislation that will pour millions of dollars into workforce training, housing and child care will help, along with a plan to send \$600 payments to low-income Oregonians.

"We're obviously watching the markets very closely and looking for ways to help Oregonians make ends meet," Brown said.

Gas prices and land use

Joe Cortwright, chair of Brown's council of economic advisers, said the most obvious direct impact on Oregon's economy is higher gas prices. Not much can be done in the short term at the state level to address rising gas prices and related costs, he said.

"The bigger issue is just all the uncertainty that it creates," he said.

The Republican governors of Georgia and Maryland temporarily suspended state gas taxes last week, and the Democratic governors of Colorado, Michigan, Minnesota, New Mexico, Pennsylvania and Wisconsin have asked congressional leaders to suspend the federal 18-cents-per-gallon gas tax through the end of the year. Federal legislation to suspend gas taxes remains stalled in Congress.

Brown has no plans to push for a suspension of Oregon's 38-cents-per-gallon gas tax, her spokesman said last week.

Oregon's long-term planning means the state is better situated to withstand fluctuations in gas prices than others, Cortwright said.

The average American drives about 25 miles per day, but the average Oregonian only drives about 20 miles per day, he said.

"We spend less money on cars and gasoline, so when the price of gasoline goes up in Oregon, it hurts us a lot less than it does the typical American," Cortwright said.

Residents of sprawling cities like Oklahoma City or Dallas, Texas easily spend twice as much on driving than the average Oregonian, he said.

Oregon cities don't sprawl to the same extent because of a 1970s law requiring urban growth boundaries, lines that limit where and how cities can expand. Cities need state approval to expand their urban growth boundaries, and state land-use laws require them to prioritize building up, not out.

Over the long run, that means fewer subdivisions proliferating on the far edges of towns and more development in the core area of a city, and Oregonians who live in cities don't have to drive far to reach most services. That insulates residents from some of the worst effects of inflation over the past year, which especially affected fuel prices and car prices, Cortwright said.

"The price of those things is going to fluctuate," he said. "What we could do locally is reduce our dependence on those things so that we don't have to spend a bigger fraction of our income."

Excerpted. Link to full article:

<https://oregoncapitalchronicle.com/2022/03/22/land-use-policy-cautious-investments-could-help-oregon-weather-economic-uncertainty/>



Oregon Has a Chance to Sharply Cut Urban Parking Mandates

May 16, 2022

Michael Andersen

Catie Gould

About 100 years ago, governments started redesigning cities around cars. On Thursday, Oregon could approve a major step to prioritize space for people and businesses again, and reduce pollution in the process.

At the heart of its effort: sharply reducing urban and suburban parking mandates.

These little-known laws that make parking lots mandatory spread quickly and quietly across the rich world, including Cascadia and nearly all of North America, in the mid-twentieth century. They banned projects that included less than a certain, often arbitrary number of parking spaces. This in turn made it illegal or prohibitively expensive to create homes, shops, or offices in many places where driving is less necessary.

In effect, parking mandates declare a parking space to be more important than a home or a job.

Oregon's proposed reform would begin to reverse that. Over the next three years, it would give the 61 jurisdictions in the state's eight largest metro areas—the urbanized areas in and around Albany, Bend, Corvallis, Eugene, Grants Pass, Medford, Portland, and Salem, home to about two-thirds of the state's population—various options for rolling back or eliminating their decades-old parking mandates, especially in designated "climate-friendly areas" (CFAs). The CFAs, whose borders would be drawn by most of the jurisdictions over the next few years, would also allow mixed-use buildings of up to four stories and see higher standards for walking, biking, and transit investments.

MANDATORY PARKING: 'A SELF-FULFILLING PROPHECY'

Parking mandates aren't the main reason we have parking lots, of course. We have parking lots because cars are useful and, in many cases, necessary. And Oregon isn't considering a ban on parking lots, new or old.

But the effect of mandatory parking lots is to keep cars necessary. By forcing buildings apart and driving up the cost of adding homes, shops, and offices to walkable areas, parking mandates make it illegal for cities to ever voluntarily evolve away from auto dependence.

Parking mandates ban new Main Streets by requiring each new 2,000-square-foot cafe to be surrounded by 5,000 square feet of parking lot. They keep buildings vacant. They drive up the rent in new apartments by hundreds of dollars a month and kill the incentive of landlords and employers to save everyone money by coordinating shared cars or discounted transit passes. They induce deadly heat islands and, by forcing new buildings to be spread out, literally cast modern auto dependence into stone.

"There's always this assumption that everyone wants to have a car, but it's, like, a self-fulfilling prophecy," said Sergio Cano, 40, a middle-school social studies teacher in Albany, Oregon, in an interview last week. "We need to stop that cycle at some point."

'FEWER PEOPLE AND DESTINATIONS ARE WALKING DISTANCE'

Cano, who said his own family owns cars and expects to always need to, nevertheless submitted testimony supporting the parking reforms last fall. It was part of the Oregon Department of Land Conservation and Development's two-year process to update statewide transportation and land use rules. Oregon calls the project "Climate-Friendly and Equitable Communities."

The project comes out of Oregon's 50-year tradition of state-led land use planning. It'd be the state's latest effort to enforce its law requiring jurisdictions within metro areas to "encourage the availability of adequate numbers of needed housing units at price ranges and rent levels which are commensurate with the financial capabilities of Oregon households." Among other things, the state also requires its metro areas' transportation systems to "minimize adverse social, economic, and environmental impacts and costs," "conserve energy," and "meet the needs of the transportation-disadvantaged."

Cano's was one of hundreds of comments on the proposal received by the commission, its members, and its staff since the project launched in April 2020.

Another came from Oregon-based transit planner Michelle Poyourow. At the land use commission's March hearing, she explained how parking requirements undermine transit service in cities like Grants Pass and Wilsonville.

"When buildings are further apart, that means fewer people and destinations are walking distance from any given bus stop," Poyourow said. "This actually causes bus routes to be more circuitous, less direct, and less frequent."

In some cities, the stakes are even higher. Eleanor Ponomareff serves as city council president in Talent, where 2020's Alameda fire destroyed 800 homes and much of the central city. As Ponomareff told the commission last September, the fire compounded a pre-existing deficit of affordable housing.

"As we rebuild, my constituents are asking for new development that is climate-friendly, less auto-dependent, more affordable and equitable, and in short, a city that is hospitable for everyone," Councilor Ponomareff said. "It makes no sense for us to continue to both prioritize and subsidize auto dependency and expect our climate and housing issues to go away."

MOST NEW BUILDINGS WILL HAVE PARKING WHETHER OR NOT IT'S REQUIRED

Some parts of Oregon have already made parking optional. Tigard, just southwest of Portland, removed parking mandates from the "Tigard Triangle", an area named for the shape of three roadways that enclose it, in 2018. Since then, the Triangle has seen three new buildings go in: all multi-story apartment buildings, two of them with ground-floor retail and two with regulated affordability. All three were built with parking, with 194 new spaces among them. That's plenty of parking—but it's also a bit less than they would have previously been required to construct. In short, the Tigard Triangle can now start the gradual process of evolving into a more transit-oriented neighborhood. At least five more buildings are now on the way.

This open-option parking exists elsewhere in Oregon, too. Central districts in Ashland, Corvallis, Eugene, Salem, and Tigard have made parking once again optional. Portland removed virtually all residential parking mandates from its apartment zones in 2020 and

from lower-density zones in 2021. Still, even in Portland—the least auto-dependent part of the state, largely because it has the most buildings constructed before the age of automobiles—most new buildings include parking, especially farther from the city core. But, as in the Tigard Triangle, Portland has opened a door to gradual change.

OPPONENTS: RULES WOULD RESTRICT SURFACE PARKING

Oregon's proposal has its detractors. This month, a coalition led by statewide advocacy groups for suburban developers, real estate agents, large businesses, and bankers launched a website attacking the rule package, including its parking reforms. The group said the changes would "make it harder to find parking" and that by "disallowing vehicular parking, circulation, access, display, or loading on-site between buildings and public streets," the proposal "up-ends decades of commercial development patterns, and may severely impact car dealerships, service stations, freight access, and any other auto-oriented business."

The critics are correct that, in addition to allowing less parking to exist if people want, Oregon would also impose several costs on new parking lots in urban areas. The critics object to new state requirements that surface parking lots larger than one-quarter acre be at least half-covered by tree canopy (to reduce heat islands), or else pay for a certain number of new solar panels. They object to a requirement to construct electric capacity for 40 percent of the spaces in new residential parking lots to one day charge electric vehicles. They object to new rules that would, within the to-be-designated climate-friendly areas and near frequent transit, prohibit very large surface parking lots.

Critics also raise concerns about various rules not related to parking. In addition to legalizing four-story mixed-use buildings throughout future climate-friendly areas, the rules essentially ban new single-detached homes and duplexes in those areas. That's a relatively mild form of a "minimum density standard," which could indeed be counterproductive in some situations.

Beyond the industry-led group, the proposal has drawn criticism from some people who sometimes park a car in the street and feel it'd be annoying if other people were allowed to save money by doing the same. It's also drawn warnings from some elected officials who say they'll get an earful from those people.

Tualatin Mayor Frank Bubenik summed things up to the land use board in March. “We just had two contentious land use hearings,” he recounted. “Apartment residents complained about the existing shortage of parking and were totally against additional units being constructed with minimal parking spots.”

PARKING REFORM HAS A LOT OF FANS

The parking reform proposal also has a coalition of supporters. Maybe that’s no surprise, since public polling shows that reducing parking mandates seems to be fairly popular with Pacific Northwest voters.

A group of 35 nonprofits from around Oregon, convened by Sightline, have co-signed a letter in support of the parking proposals. Supporters include affordable housing providers such as REACH Community Development and Bienestar; environmentalist and environmental justice groups like Verde, OPAL Environmental Justice Oregon, the Sierra Club’s Oregon chapter, and Portland Audubon; tenant advocates like the Springfield Eugene Tenant Association and Portland: Neighbors Welcome; business advocates like Beaverton Downtown Association and Business for a Better Portland; transportation reformers like Oregon Walks, Bend Bikes, and Better Eugene Springfield Transportation; and anti-sprawl groups like 1000 Friends of Oregon and Central Oregon Landwatch.

Many of those signers are also part of a separate coalition that has, like Sightline, endorsed the full package of changes that includes the parking reform.

Why do such a wide variety of Oregonians support lower parking mandates? Maybe for the same reason that parking mandates were so easily and quietly created, 60 to 70 years ago. Each unnecessary parking space alone doesn’t harm very many people very much, at least in the short term. So requiring buildings to have more parking than they’ll need, just in case, can seem prudent.

But those same requirements to overbuild parking harm many different people in many different ways. Especially over the long term.

“We’ve heard from an unusually diverse set of interests, from affordable housing advocates to conservation folks to local government folks, that this is an important step,” said Evan Manvel, the state planner who’s managed the parking reform proposal. “Parking mandates impose hidden costs on everyone.”

The New York Times

Can Portland Be a Climate Leader Without Reducing Driving?

April 21, 2022

Nadja Popovich

Brad Plumer

Portland has tried harder than most American cities to coax people out of their cars.

Over the past few decades, Oregon's largest city has built an extensive light rail system, added hundreds of miles of bike lanes and adopted far-reaching zoning rules to encourage compact, walkable neighborhoods. Of the 40 largest U.S. metropolitan areas, Portland saw its residents drive the third-fewest miles per day in 2019, on average, behind only New York and Philadelphia.

But despite Portland's efforts, the number of cars and trucks on its roads has kept rising as the city and its suburbs have grown — along with tailpipe pollution that is warming the planet. While Portland has set ambitious climate goals, the city is not on track to meet its targets, largely because emissions from transportation remain stubbornly high.

Now the city faces a fresh challenge: To deal with traffic jams, state officials want to expand several major highways around Portland. Critics say that will only increase pollution from cars and trucks at a time when emissions need to fall, and fast.

There's a \$1.2 billion proposal to widen and partially cover a busy stretch of Interstate 5 near the Rose Quarter in the city's center. There's a nearly \$5 billion plan to replace and expand the aging six-lane bridge crossing the Columbia River from Portland to suburban Vancouver, Wash. And there's an effort to upgrade and add lanes to portions of Interstate 205 along Portland's southern edge, among other projects.

Supporters, including Oregon Gov. Kate Brown, a Democrat, say Portland's highways need to be enlarged to improve road safety and alleviate growing congestion, while arguing that idling cars and trucks create extra pollution when stuck in traffic.

But opponents point to decades of research showing that whenever lanes are added to busy freeways, more cars show up to fill the available space, a phenomenon known as “induced traffic demand.” Emissions from additional driving would outweigh any benefits from reduced idling, studies show.

Youth activists have been protesting the highway plans for nearly a year, and environmental groups have filed legal challenges. “Portland has a reputation as a really progressive and green city,” said Adah Crandall, a 16-year-old organizer with the Portland chapter of the youth-led Sunrise Movement. “We should be a leader on taking climate action, and that’s just not what we’re seeing happen.”

Similar conflicts are unfolding across the United States. Transportation is the nation’s largest source of greenhouse gases, accounting for 29 percent of emissions. And most major U.S. metro areas have seen a sharp rise in driving-related emissions over the past three decades as cities have sprawled.

President Biden visited Portland on Thursday to promote the new federal infrastructure law, which invests billions of dollars in climate-friendly programs like electric-car charging stations and mass transit. But the law provides far more money for roads, which studies show could significantly increase emissions overall if states keep expanding highway capacity, as they have done for decades.

“We must build a better America, and a good place to start is right here in Portland,” Mr. Biden said.

Now the city has become ground zero for a nationwide debate over whether it makes sense to keep laying asphalt as the planet heats up.

“That’s what the big fight is,” said Jo Ann Hardesty, a city commissioner who oversees Portland’s bureau of transportation. “Do we plan for a future 50 years from now where we have mitigated climate change, where we have a variety of options and neighborhoods where we have created walking communities? Or are we going to be a community of suburbs where everybody drives to everything?”

A Struggle to Reduce Driving

In recent years, environmentalists and policymakers have focused on cleaner electric cars as the best way to cut tailpipe emissions.

But even with sales rising fast, it could take decades to retire all the gas-burning vehicles still on the road. And electric cars have their own environmental costs: They require mining for battery components and power plants to charge them.

To cut emissions fast enough to stave off dangerous levels of global warming, studies have concluded, Americans will likely also need to drive less.

“If we want to meet these ambitious climate targets, we really have to do everything,” said Heather MacLean, a professor of civil and mineral engineering at the University of Toronto. “Electric vehicles are critical, but so are policies that reduce the need for vehicle travel in the first place, like expanding high-quality public transit or designing neighborhoods where people can take shorter trips.”

Yet even progressive cities like Portland, which boasts some of the highest cycling rates in the country, are struggling to curb car travel.

In some parts of Portland, particularly near downtown, it’s feasible to go car free. The blocks are designed to be shorter than in most cities, and easily walked. Buses and streetcars are dependable; bike share stations and green bike lanes are ubiquitous. In 2015, the city opened the first major U.S. bridge entirely closed to cars and trucks, Tilikum Crossing over the Willamette River, which on a recent spring morning bustled with cyclists and pedestrians.

Just four miles to the east, however, automobiles rule the road. Along 82nd Avenue, a five-lane thoroughfare running through some of East Portland’s most racially diverse and low-income neighborhoods, there are no bike lanes, the sidewalks are narrow and poorly lit at night and cars speed furiously. Last year, two pedestrians were hit and killed by drivers at the same intersection in the span of a month. The city has a \$185 million plan to improve safety there.

The narrative about Portland as bike and transit-friendly “is only true for an absurdly small segment of the city,” said Vivian Satterfield, director of strategic partnerships at Verde, a

nonprofit helping to bring environmental investments to the city's low-income neighborhoods.

Portland has adopted an aggressive climate change goal to stop adding carbon dioxide to the atmosphere altogether by 2050. But emissions from cars and trucks have crept upward in recent years.

Experts cite several reasons. After gasoline prices crashed in 2014, more people found it cheaper to drive, and transit ridership and cycling rates fell. (Whether this trend reverses now that oil prices are spiking again remains to be seen.) At the same time, Portland's transit agency, TriMet, cut service amid a budget crunch. By the time lawmakers had increased funding, the coronavirus pandemic arrived, scaring people off buses and trains.

What's more, despite zoning rules aimed at constraining suburban sprawl, much of the Portland area is not dense enough to support the amount of transit available in the city center. In recent years, housing prices in Portland's most walkable neighborhoods have skyrocketed, pushing lower-income residents further out to places like East Portland, where it's difficult to get around without a car.

"It is fair to say that Portland has tried harder than most U.S. metros to reduce car dependence," said Joe Cortright, an economist based in Portland who writes about transportation issues on his influential blog, City Observatory. "But our efforts around biking, walking, transit and land use are still puny relative to the scale of our climate objectives."

Portland officials are now trying to do more. The city is adding bike lanes and bus rapid transit to long-neglected parts of East Portland. It has eliminated requirements for new homes to include parking spaces, while Oregon's legislature has reformed zoning to allow slightly denser housing across most of the city. And policymakers are exploring ways to extend light rail or other transit to the northern suburb of Vancouver, Wash., though the idea has historically faced opposition from residents there.

Yet even small changes to take space away from cars can be contentious, said Ms. Hardesty, the Portland transportation commissioner. "I see pushback all the time," she said. "People are furious that we reduced speed limits on some streets to try to improve bike and pedestrian safety. It's not easy."

The other big obstacle has been money, said Rebecca Lewis, an associate professor of planning at the University of Oregon. Portland is still “not investing in transit in the way that we might need to” in order to reach its climate goals, she said.

Most of Oregon’s transportation budget comes from gas taxes, which under the state constitution must be spent on roadways. In 2020, Portland’s regional government asked voters to approve \$7 billion in additional funding for measures like expanding the city’s MAX light rail line and, in a nod to suburban voters, major road upgrades. But the measure failed, opposed by businesses that would have faced higher taxes and even by some activists who said it devoted too much money for cars.

Now, with the federal government sending Oregon at least \$4.5 billion for transportation over the next five years through the infrastructure law, the debate has erupted again: How much money should be spent on roads?

‘Break Up With Freeways’

On a damp February afternoon, a group of mostly teenage protesters gathered outside Harriet Tubman Middle School, which overlooks the stretch of Interstate 5 that state officials want to widen, and wrote “Valentine’s” cards imploring Oregon’s Department of Transportation to “break up with freeways.”

Below, traffic slowed to a crawl as commuters crowded I-5. A few years ago, the school had to install a multimillion-dollar heating and cooling system to filter out vehicle exhaust from the highway. Students have been warned to limit their time outside.

The protests have come as Portland has been battered by global warming. Last year, a record-shattering heat wave killed 54 people across the city and temperatures rose enough to melt the cables on Portland’s streetcar system.

“The goal is to stop freeway expansions and instead invest in decarbonizing our transportation system,” said Ms. Crandall, a former Tubman student. “These are our futures on the line.”

The demonstrations are having an impact. Local leaders and community groups have increasingly urged Oregon’s Department of Transportation to address the project’s effects

on the climate as well as the surrounding community. In January, the Biden administration ordered the state to redo its environmental analysis of the I-5 Rose Quarter expansion.

The state transportation agency, which established a climate office in 2020, has not historically considered induced traffic demand when planning new highways. But according to a calculator developed by the Rocky Mountain Institute, a nonprofit focused on clean energy, a project like the I-5 expansion could increase local greenhouse gas emissions by tens of thousands of tons per year if, as expected, vehicle travel increases.

Amanda Pietz, an administrator at Oregon's Department of Transportation, said that while addressing climate change will "require a fundamental shift in how we do business," officials need to balance climate goals with other transportation imperatives.

"From a safety perspective and from a congestion perspective," Ms. Pietz said, expanding I-5 through central Portland "is still the right solution." The project, which has support from the trucking industry and commuters sick of being stuck in traffic, would significantly widen the shoulders and add two "auxiliary lanes" along a 1.7-mile segment to make merging easier. The agency is exploring how to make sure those changes don't lead to additional emissions, potentially including new tolls to curb traffic demand and help pay for the project, she said.

The latest version of the project, costing some \$1.2 billion, would include construction of a four-acre "cap" to partly cover the highway and reconnect the former Albina neighborhood, a historically Black community that was partially destroyed when I-5 was built in the 1960s. The plan, which came out of negotiations with local Black leaders, will also relocate the middle school away from the highway.

Rukaiyah Adams, the chair of Albina Vision Trust, a nonprofit organization that aims to revitalize the neighborhood, said the group would rather see the highway gone but supports the latest compromise.

"Being purist about it doesn't really solve the problem for us," Ms. Adams said. A highway cap would allow for safer walking routes across the freeway and the development of more mixed-income housing in an area where many Black residents have been priced out in recent decades, she said.

Climate activists have questioned why state leaders can't cap the highway without expanding the road beneath it.

The highway expansions in Portland illustrate a nationwide truth: Cities, even those with big climate ambitions, don't always control their own destiny when it comes to transportation.

In Texas, the city of Austin plans to invest billions of dollars in a new light rail system. But at the same time, the state is pushing ahead with a \$5 billion plan to add four lanes to Interstate 35 through downtown. In Illinois and Washington, state officials are eyeing highway widening projects around Chicago and Seattle even as they set goals for slashing greenhouse gas emissions.

Opponents of these projects say traffic can be more effectively managed with tools like congestion pricing, which involves charging fees during peak travel periods, in order to discourage some trips. But others say highway expansions are hard to avoid.

"We're growing and there are always going to be transportation needs, especially on the freight side," said David Schrank, a senior research scientist at the Texas A&M Transportation Institute. "Even if we're working from home, all these things are being delivered to us."

Portland is no stranger to these fights. When the federal government was building interstate highways through cities in the 1960s and 1970s, residents in Portland famously blocked the proposed Mt. Hood Freeway that would have torn through Southeast Portland. In the aftermath, city and state officials began diverting unused highway funds toward biking and public transportation projects instead.

While those protests weren't about climate change, the debate resonates today.

"Fifty years ago we had the political will to stop freeways," said Aaron Brown, a co-founder of the group No More Freeways, which has been working with the youth climate activists in Portland. Now, "the big question is not just how we stop this in Portland, but how we get people to make the connection between freeways and climate change all over the country."

<https://www.nytimes.com/interactive/2022/04/21/climate/portland-emissions-infrastructure-environment.html>

The New York Times

How green is your metropolis?

April 21, 2022

Paul Krugman

Normally, a special election for California's State Assembly wouldn't have much national significance — especially not an election in San Francisco, a liberal, Democratic city that's the opposite of a swing district.

But this particular election was fought largely over housing policy. The winner had the backing of the newly rising Yimby — Yes in My Backyard — movement that has emerged in opposition to Nimbyism, calling for more housing construction and higher urban population density. And if this is a straw in the wind for national policy, the consequences for both the economy and the environment could be hugely positive.

Some background: On the eve of the coronavirus pandemic, America's big cities were in many ways in better shape than ever before in their history. Urban social problems hadn't vanished, but they had receded. In New York, in particular, homicides were down 85 percent from their level in 1990. At the same time, the knowledge economy was drawing businesses to large, highly educated metropolitan areas.

For a little while it seemed as if the pandemic might reverse these gains: The coronavirus hit New York hard during its early months, and there were many assertions that high population density was a health hazard. As we learned more about how to deal with the virus, however — and especially after vaccines became available — densely populated urban areas became substantially safer than rural areas, if only because their residents were more willing to wear masks and get vaccinated.

It's true that crime, especially shootings, rose sharply during the pandemic. But this is not restricted to big cities. And even now New York's crime rate is considerably lower than it was when, say, Rudy Giuliani was mayor. (Whatever happened to him?)

And if housing markets are any indication, big cities' appeal has rebounded. Rents in New York fell sharply during the worst of the pandemic, but they have now fully reversed that decline.

Which is a problem. You see, cities have become highly desirable places to live and work; as I'll explain in a minute, they're also good for the environment. But they've become increasingly unaffordable, largely because of local-level opposition to new construction.

Where does this opposition come from? There has always been a segment of U.S. opinion that views dense urban living as inherently dystopian. Senator Tom Cotton was widely mocked when he tweeted (falsely) that Democrats "want to make you live in downtown areas, and high-rise buildings, and walk to work, or take the subway" as if this lifestyle — which quite a few of us find appealing — was horrible. But many Americans probably share his views.

Some of the opposition also reflects selfishness: Affluent residents of expensive communities often want to keep housing prices high by restricting the housing supply.

But a significant proportion of the opposition to density may reflect honest misunderstandings of what density does.

According to a recent YouGov survey, three in four Americans believe that it's better for the environment if houses are built farther apart. And you can sort of see why they believe that. Someone who lives in a leafy suburb, let alone in a rural area, is surrounded by more greenery than someone in an urban high-rise. So wouldn't the nation as a whole be greener if everyone spread out more?

The answer, of course, is no, because this seemingly common-sense view involves a fallacy of composition. Imagine taking a square mile of Manhattan holding about 70,000 people — which, by the way, is much quieter and feels much less crowded than people who haven't lived in such a neighborhood can easily imagine — and spreading its population out to a typical suburban density. These people would then occupy about 35 square miles. The footprint of their houses, the roads they need to get around (because everything has to be done in a car), their shopping malls and so on would end up paving over far more green space than they used in New York.

Dense cities also use much less energy per capita than suburbs, largely because their residents drive less, relying instead on walking and various forms of public transit, including the extremely efficient mode known as the elevator.

So while nobody is suggesting that we force Americans to live like New Yorkers, allowing more people to live that way by permitting more density would be good for the environment.

It would also be good for the economy. Some people are willing to pay very high prices for urban housing because they're more productive in big cities. So limiting density makes America poorer, by preventing workers from making the best use of their talents. One recent study estimated that reducing land-use restrictions in a few major cities would add 3.7 percent to U.S. gross domestic product — that is, almost \$900 billion a year.

So let's hear it for Yimbys. Opposition to urban density has done a remarkable amount of harm. Reducing that opposition could do a surprising amount of good.

https://www.nytimes.com/2022/04/21/opinion/housing-density-cities.html?campaign_id=39&emc=edit_ty_20220422&instance_id=59162&nl=opinion-today%C2%AEi_id=68624886&segment_id=89940&te=1&user_id=6fd01d767089e918516c2d993e5a10b1

STREETS BLOG

International climate report demands 'systemic' changes to transportation and urban planning

April 22, 2022

Christian MilNeil

The deadline to make dramatic reductions in climate-heating pollutants is closing fast, according to the latest report from the Intergovernmental Panel on Climate Change (IPCC), and cities and transportation agencies will both need to transform themselves dramatically in the next decade to avoid the worst effects of a heating climate.

Earlier this month, the IPCC published the third and final volume of its latest climate assessment report. While volume one synthesized the most recent physical science on climate change, and a dour second volume surveyed the severe impacts and disasters already underway from a heating climate, the third volume focuses on what humanity needs to do to curtail climate pollution and limit warming to 1.5° to 2° C above 20th-century temperatures.

The IPCC offers policymakers a long menu of policy ideas that could help society meet that goal. But progress to date has been so sluggish, and the need to dramatically reduce emissions so urgent, that policymakers will need to adopt most of the report's recommendations, and on a blisteringly fast timeline, while also forcefully turning away from fossil-fueled industries and energy-inefficient transportation systems.

As the third volume's executive summary puts it:

"Continuing investments in carbon-intensive activities at scale will heighten the multitude of risks associated with climate change and impede societal and industrial transformation towards low carbon development. Meeting the long-term temperature objective in the Paris Agreement therefore implies a rapid turn to an accelerating decline of greenhouse gas emissions towards 'net zero', which is implausible without urgent and ambitious action at all scales."

Many of the necessary mitigation strategies will involve major changes in the ways we generate electricity, manage forests, and practice agriculture.

But the report also stresses that cities and urbanized regions (which includes most of Massachusetts) will need to play a significant role in eliminating greenhouse gas pollution.

“A range of 5-30 percent of global annual greenhouse gas emissions from end-use sectors are avoidable by 2050... through changes in the built environment, new and repurposed infrastructures and service provision through compact cities, co-location of jobs and housing, more efficient use of floor space and energy in buildings, and reallocation of street space for active mobility,” according to the report’s Summary for Policymakers.

The report argues for increased use of electric vehicles, but also makes clear that simply replacing gasoline with batteries won’t be enough: cities must also dramatically curtail the use of automobiles and avoid “locking in” future emissions with more car-dependent infrastructure.

An entire chapter of the new report focuses on cities and urban development, while another chapter focuses on the transportation sector. These two chapters offer numerous marching orders for municipal officials and transportation agencies like MassDOT:

- “There is a growing need for systemic infrastructure changes that enable behavioral modifications and reductions in demand for transport services that can in turn reduce energy demand” (10-4)
- “Cities are especially prone to carbon lock-in because of the multiple interactions of technological, institutional, and behavioral systems, which create inertia and path dependency that are difficult to break. For example, the lock-in of gasoline cars is reinforced by highway and energy infrastructures that are further locked-in by social and cultural preferences for individual mobility options. The dominance of cars and their supporting infrastructures in auto-centric urban forms is further reinforced by zoning and urban development patterns, such as dispersed and low-density housing distantly located from jobs, that create obstacles to create alternative mobility options” (8-54)
- “Cities can reduce their transport-related fuel consumption by around 25 percent through combinations of more compact land use and the provision of less car-dependent transport infrastructure. Appropriate infrastructure, including

protected pedestrian and bike pathways, can also support much greater localized active travel” (10-4).

- “Infrastructure investments influence the structural dependence on cars, which in turn influence the lock-in or path dependency of transport options with their greenhouse emissions. The 21st century saw a new trend to reach peak car use in some countries as a result of a revival in walking and transit use... there is a need for increased investments in urban form strategies that can continue to reduce car-dependency around the world” (10-15)
- “How new cities and towns are designed, constructed, managed, and powered will lock-in behavior, lifestyles, and future urban greenhouse gas emissions” (8-4)
- “Integrated spatial planning to achieve compact and resource-efficient urban growth through co-location of higher residential and job densities, mixed land use, and transit-oriented development could reduce greenhouse gas emissions between 23-26 percent by 2050 compared to the business-as-usual scenario (robust evidence, high agreement, very high confidence)” (8-6)

<https://mass.streetsblog.org/2022/04/22/international-climate-report-demands-systemic-changes-to-transportation-and-urban-planning/>

Compilation of Public Comments in Support of Climate
Friendly and Equitable Communities Submitted to DLCD

Letter of Support for Climate-Friendly & Equitable Communities

May 18, 2022

Land Conservation and Development Commission
Department of Land Conservation and Development
635 Capitol Street NE Suite 150
Salem, OR 97301

Dear Commissioners:

RE: CFEC Rule Making Adoption and Implementation

As a Realtor and Homeowner in Central Oregon for 30 years, I have watched it grow and continue to be a draw for residents of other states. It is time to wake up to the fact that nearly all my clients that choose to live in Bend want to walk or bike to work and services. Yet we have not created a safe, continuous Bike Path that other towns have.

We have "Scenic Bikeways" that turn to gravel vs. paved shoulders or Bike Paths. Unfinished, unsafe, on busy roads. Our mass transit is limited and not appealing to most so they drive. Without paved, continuous bike paths, a larger network system, the car becomes the #1 transportation source here.

I have lived in Boulder, CO and Boston, MA and rode my bike to work year round, even in the snow. This is a missing part of Bend and Central Oregon and other parts of Oregon.

Now is the time to address this important issue.

The Central Oregon Realtors Association (COAR), sent out a notice for all of us to sign "against" this plan. Not providing any information or links. I do not agree with their position. I instead believe that to continue to build without the responsibility of infrastructure in place first and creating climate-friendly ways to get around, we would then be stuck in the past and not moving in the right direction. A safe, healthy, livable environment is not too much to ask for.

Thank you for your time on this much needed Land Use Planning and Transportation goals that are more Climate Friendly & Equitable for Oregon now and in the future.

Sincerely,
Diane Lozito
BendAreaRealtor@gmail.com

From: [TAYLOR Casaria * DLCD](#)
To: [JOHNSON Esther * DLCD](#)
Subject: FW: comments on CFEC
Date: Tuesday, May 17, 2022 2:05:13 PM

For the CFEC materials



Casaria Taylor

Rules, Records, and Policy Coordinator | Director's Office
Pronouns: she/her
Cell: 971-600-7699 | Main: 503-373-0050
casaria.taylor@dlcd.oregon.gov | www.oregon.gov/LCD

From: Jeffrey Clair <jeff@portlandlandbroker.com>
Sent: Monday, May 16, 2022 10:25 AM
To: TAYLOR Casaria * DLCD <Casaria.TAYLOR@dlcd.oregon.gov>
Subject: comments on CFEC

As a real estate broker, I fully support the LCDC's CFEC proposals and timeframe. Urban density is imperative in order to reduce global warming. Large, dense cities are dynamic, attract workforce talent and create vibrant communities. We don't need more car-dependent, single-family residences with large yards in Portland, we need to update the zoning to accommodate more options for development, especially with medium density zoning, the type of zoning that is currently sorely lacking.

Regards,
Jeff

--

Jeffrey Clair
(503) 893-8403 / (541) 368-8463
Licensed Broker: All Professionals RE

Subject: Please make our communities walkable and bikeable

Multiple copies of this form letter were received from the following individuals. One copy of the form letter is attached to this cover.

	Date Received	Name
1.	4/26/2022	Ray Batch
2.	4/26/2022	Richard Pross
3.	4/26/2022	Phillip Callaway
4.	4/26/2022	George Yolland
5.	4/26/2022	Britney VanCitters
6.	4/26/2022	Cathy Tinker
7.	4/26/2022	Eileene Gillson
8.	4/26/2022	Kerie Raymond
9.	4/26/2022	Nora Polk
10.	4/26/2022	Earl Randall
11.	4/26/2022	Gary Millhollen
12.	4/26/2022	Matthew Barmann
13.	4/26/2022	Diane Hodiak
14.	4/26/2022	Craig Mackie
15.	4/26/2022	Deborah Burdick
16.	4/26/2022	Cora Rose
17.	4/26/2022	Camilo Marquez
18.	4/26/2022	Jan Renee
19.	4/26/2022	Ted LaPage
20.	4/26/2022	Michael Ryan
21.	4/26/2022	Hillary Tiefer
22.	4/26/2022	Laura Hanks
23.	4/26/2022	Linda Ganzini
24.	4/26/2022	Linda McGavin
25.	4/26/2022	Kathleen Johnson
26.	4/26/2022	Diane Chavez
27.	4/26/2022	Shannon Hunter
28.	4/26/2022	Virginia Feldman
29.	4/26/2022	Anita Melbo
30.	4/26/2022	Charlotta Ball
31.	4/26/2022	Milton and Shirley Nelson
32.	4/26/2022	Patrice Roberts
33.	4/26/2022	Barbara Bernstein
34.	4/26/2022	John Tyler
35.	4/26/2022	John Nettleton
36.	4/26/2022	B. Greene
37.	4/26/2022	Elizabeth Callison

38.	4/26/2022	Marilyn Mooshie
39.	4/26/2022	Rebecca Crowder
40.	4/26/2022	Victoria Koch
41.	4/26/2022	Jennifer Finley
42.	4/26/2022	Kim Davis
43.	4/26/2022	Kim Wick
44.	4/26/2022	Wendy Holzman
45.	4/26/2022	Lynn Betteridge
46.	4/26/2022	Anne Ackley
47.	4/26/2022	Kathleen Ruiz
48.	4/26/2022	Rich Schwartz
49.	4/26/2022	Leslie Kerr
50.	4/26/2022	Denise Duren
51.	4/26/2022	Brett Miller
52.	4/26/2022	Edith Montgomery
53.	4/26/2022	Stephen Bachhuber
54.	4/26/2022	William Heerd
55.	4/26/2022	Phil Houston Goldsmith
56.	4/26/2022	Debra Wilson
57.	4/26/2022	Kristen Swanson
58.	4/26/2022	Ray Neff
59.	4/26/2022	Robert Thornhill
60.	4/26/2022	T. Jeffries
61.	4/26/2022	Michael Kadoya
62.	4/26/2022	Jules Moritz
63.	4/26/2022	Maurine Canarsky
64.	4/26/2022	Susan Heath
65.	4/26/2022	Philip Ratcliff
66.	4/26/2022	Lauren Murdock
67.	4/26/2022	Lauren Murdock
68.	4/26/2022	Anna Cowen
69.	4/26/2022	Niall Carroll
70.	4/27/2022	Linda Kubes
71.	4/27/2022	Julie Masters
72.	4/27/2022	William Heerd
73.	4/27/2022	Peggy Harkins
74.	4/28/2022	Kim Hosford
75.	4/29/2022	Amy Roberts
76.	4/29/2022	Larry Morningstar
77.	4/30/2022	Steve Tichenor
78.	4/30/2022	Craig Marburger
79.	5/3/2022	Helen Hays

From: montevena@everyactioncustom.com on behalf of [Ray Batch](#)
To: [CFEC DLCD * DLCD](#)
Subject: Please make our communities walkable and bikeable
Date: Tuesday, April 26, 2022 10:01:43 AM

Dear Land Conservation and Development Commission,

I'm writing to ask you to do your best to create a brighter future as you go through the Climate-Friendly and Equitable Communities rulemaking process. Please help make our communities more walkable and bikeable, and improve public transit.

We have the opportunity to restructure our cities and make them easier places to walk, bike, and roll, and I urge you to take this once-in-a-generation opportunity to transform our communities.

Thank you.

Sincerely,
Ray Batch
5000 Carman Dr Lake Oswego, OR 97035-3346
montevena@yahoo.com

Subject: Make Our Communities Walkable and Bikeable

Multiple copies of this form letter were received from the following individuals. One copy of the form letter is attached to this cover.

	Date Received	Name
1.	4/26/2022	Savannah Wright
2.		Dana Weintraub

From: sjwright@everyactioncustom.com on behalf of [Savannah Wright](#)
To: [CFEC DLCD * DLCD](#)
Subject: Make our communities walkable and bikeable!
Date: Tuesday, April 26, 2022 10:12:04 AM

Dear Land Conservation and Development Commission,

I'm writing to ask you to create a brighter future as you go through the Climate-Friendly and Equitable Communities rulemaking process. Please make our communities more walkable and bikeable, and improve public transit.

You are elected officials and therefore have a duty to represent the people. We NEED more multimodal infrastructure for our physical and mental well being.

We have the opportunity to restructure our cities and make them easier places to walk, bike, and roll, and I urge you to take this once-in-a-generation opportunity to transform our communities.

The future will thank you.

Sincerely,
Savannah Wright
2748 Avalon Ave SE Salem, OR 97306-8814
sjwright@willamette.edu

AGENDA ITEM 3
MAY 19-20, 2022-LCDC MEETING
EXHIBIT 6

83

From: prin@everyactioncustom.com on behalf of [Kris N.](#)
To: [CFEC DLCD * DLCD](#)
Subject: Biking and walking deserve a chance
Date: Thursday, April 28, 2022 10:05:05 AM

Dear Land Conservation and Development Commission,

I'm writing to ask you to do your best to create a brighter future as you go through the Climate-Friendly and Equitable Communities rulemaking process. Please help make our communities more walkable and bikeable, and improve public transit.

We have the opportunity to restructure our cities and make them easier places to walk, bike, and roll, and I urge you to take this once-in-a-generation opportunity to transform our communities.

Thank you.

Sincerely,
Kris N.
633 NE 68th Ave Portland, OR 97213-5523
prin@phoenixfi.com

AGENDA ITEM 3
MAY 19-20, 2022-LCDC MEETING
EXHIBIT 7

84

From: [Nicolette Linse](#)
To: [CFEC DLCD * DLCD](#)
Subject: CFEC - Do not water down NACTO standards!
Date: Thursday, April 28, 2022 3:23:06 PM

I am asking the LCDC Commissioners to direct staff to include solely the NACTO Urban Bikeway Design Guide 2nd Edition as the safe harbor and clear standard for all on-street bicycle networks.

ODOT guidelines should not be applicable or referenced because ODOT has jurisdiction over state highways, and the connected bike network mandated by the rules should not be on state highways unless absolutely necessary. If it is necessary, and reference to an ODOT document is required, then the use of ODOT's guidelines should be only on that state highway segment. For all city streets, I am asking that the NACTO guidelines be used.

This is important to me because I, personally, would like to ride my bike as a primary mode of transportation and not feel I'm literally risking my life when doing so. Also, maximum safety on roads promotes basic public health for all citizens. I would take pride in our state for being proactive towards safety and promoting physical fitness while doing so. Ideally, our youngest citizens will feel connected to the outdoors while safely participating in daily events on bicycle from as early an age as possible.

From: [Gina Franzosa](#)
To: [CFEC DLCD * DLCD](#); [HOLMSTROM Bill * DLCD](#); [YOUNG Kevin * DLCD](#); [TAYLOR Casaria * DLCD](#)
Subject: Public comment
Date: Thursday, April 28, 2022 4:02:42 PM

Hello,

I am writing to ask the LCDC Commissioners to direct staff to include solely the NACTO Urban Bikeway Design Guide 2nd Edition as the safe harbor and clear standard for all on-street bicycle networks and not the ODOT urban design blueprint.

This is critically important because bicycle facility design has evolved tremendously and ODOT is frankly behind the times. The NACTO Guide is comprehensive, nationally recognized, readily available online, actually full of useful information, and most importantly results in facilities that are safer for cyclists. I don't understand why ODOT spends tax dollars on their own design guides when there are many nationally utilized design guides that contain the world of best practices, including the NACTO urban bikeway design guide.

Specifically referencing NACTO is also critical because many towns and cities do not have experience with bike facilities, including my own community - Bend. I feel the rules do need to instruct Cities on best practices by referencing NACTO.

Furthermore, ODOT does not design urban roads in cities or towns for people. ODOT designs highways and if you look at any ODOT attempt at an urban road, it's horrifically unsafe for pedestrians and cyclists.

I see no reason why any ODOT design guides should be included in Climate Friendly and Equitable Communities as this agency demonstrates no interest in either climate friendly or equitable community design.

Thank you for your hard work on these important rules.

Sincerely,

Gina

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Gina L. Franzosa
gina.franzosa@gmail.com
503.816.9778

AGENDA ITEM 3
MAY 19-20, 2022-LCDC MEETING
EXHIBIT 9

86

From: carol2049@everyactioncustom.com on behalf of Carol Lauritzen
To: [CFEC DLCD * DLCD](#)
Subject: Support an aging population
Date: Thursday, April 28, 2022 8:16:27 PM

Dear Land Conservation and Development Commission,

Many of us are aging and are no longer comfortable nor confident in driving in city traffic. I'm writing to ask you to do your best to create a brighter future as you go through the Climate-Friendly and Equitable Communities rulemaking process. Please help make our communities more walkable and bikeable, and improve public transit. This is particularly important to me as I am an active person who wants to continue thriving in an urban environment.

We have the opportunity to restructure our cities and make them easier places to walk, bike, and roll, and I urge you to take this once-in-a-generation opportunity to transform our communities.

Thank you.

Sincerely,
Carol Lauritzen
801 O Ave La Grande, OR 97850-2212
carol2049@gmail.com

AGENDA ITEM 3
MAY 19-20, 2022-LCDC MEETING
EXHIBIT 10

87

From: [Cort Vaughan](#)
To: [CFEC DLCD * DLCD](#)
Subject: CFEC - Do not water down NACTO standards!
Date: Friday, April 29, 2022 1:14:01 PM

I am tired of hearing local developers or ODOT say that bike safety is too expensive. Bike lanes with barriers and separated bike paths pay for themselves by decreasing auto travel and saving lives.

I want to ride my bike with my grandchildren without fear of being hit by a distracted driver.

I am asking the LCDC Commissioners to direct staff to include solely the NACTO Urban Bikeway Design Guide 2nd Edition as the safe harbor and clear standard for all on-street bicycle networks.

ODOT guidelines should not be applicable or referenced because ODOT has jurisdiction over state highways, and the connected bike network mandated by the rules should not be on state highways unless absolutely necessary. If it is necessary, and reference to an ODOT document is required, then the use of ODOT's guidelines should be only on that state highway segment. For all city streets, I am asking that the NACTO guidelines be used.

Cort Vaughan
541-408-7651

From: [Karon Johnson](#)
To: [CFEC DLCD * DLCD](#)
Subject: CFEC - Do not water down NACTO standards!
Date: Sunday, May 1, 2022 10:34:04 PM

I am asking the LCDC Commissioners to direct staff to include solely the NACTO Urban Bikeway Design Guide 2nd Edition as the safe harbor and clear standard for all on-street bicycle networks.

I used to bike 2 miles to the closest Safeway in my neighborhood. I don't anymore because it's just too dangerous. I have to cross Reed Market Road, then take a diagonal across Wilson & 15th. Both are high-traffic roads; the little 6" wide white strip are no protection.

I just got back from Barcelona, which has wide bike lanes along every major street. They have 6"-high barriers embedded in the pavement. That's safety!

I don't see what ODOT has to do with how we configure the bike lanes on our city streets.

Thank you,
Karon Johnson
61250 King Solomon Lane
Bend, OR 97702

From: [Peter Geiser](#)
To: [CFEC DLCD * DLCD](#)
Cc: [Peter Geiser](#)
Subject: Climate-Friendly and Equitable Communities Rules
Date: Wednesday, April 13, 2022 4:32:39 PM

Thank you for helping to ensure implementation of the Climate-Friendly and Equitable Communities Rules. This is such a critical time to support affordable housing, community safety and environmental sustainability.

Peter Geiser
P.O. Box 581
Bend, Oregon 97709
geiserbend@gmail.com
cell (541) 410-9645

From: djeeley@stpaultel.com
To: [CFEC DLCD * DLCD](#)
Subject: Climate Friendly rulemaking
Date: Wednesday, April 13, 2022 9:37:14 PM

Land Conservation and Development Commission
Department of Land Conservation and Development
635 Capitol Street NE Suite 150
Salem, OR 97301

RE: Oregon needs to tackle climate change head-on but not get flattened in the collision.

Dear Commissioners,

Climate change is here, it is high time for tangible action and I appreciate your efforts to prioritize climate change in the land use rules..

The Climate-Friendly and Equitable Communities rulemaking process is a once-in-a-generation opportunity to achieve transformative outcomes for urban communities statewide. Increasing affordable housing options and ways to safely walk, bike, roll, and take transit will make our cities more climate-friendly, more equitable, more livable and I support it. However I do not live in an urban area and would like to encourage the same goals in our rural areas. We do need to protect good soils and minimize commuting from rural areas to city jobs but we also need to provide housing close to our agricultural jobs that workers can afford. Please also prioritize simple enforceable rules and rapid straight forward answers for land use applications, particularly housing related applications. We should discourage McMansions for the urban commuters and encourage decent, modest, affordable homes for those who work the land and broadband access to allow remote work where practical and increased mechanization where fiscally necessary.

Dan Keeley
5975 Buyserie Rd. NE
St. Paul, OR 97137
503-508-7807

From: [Rebecca Kay](#)
To: [CFEC DLCD * DLCD](#)
Subject: Climate Friendly and Equitable Communities
Date: Thursday, April 14, 2022 8:19:28 AM

There is nothing more important at this time in history than to address the climate crisis with vigor, urgency, and an unrelenting dedication to making an impact.

Please do everything that you can in your power to ensure that our communities are taking the necessary steps to address the climate crisis in an equitable way.

When we take action for the climate, many good things happen. Please, let us do those good things together, for everyone.

Best,

Rebecca Kay
She/Her
Rebecca Kay Media

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Rebecca Kay
Pronouns: She/her/they/them
Rebecca Kay Media
Social Media Marketing
(858) 401-9573

AGENDA ITEM 3
MAY 19-20, 2022-LDCD MEETING
EXHIBIT 21

92

From: janemir@everyactioncustom.com on behalf of [jane bartosz](#)
To: [CFEC DLCD * DLCD](#)
Subject: More than ever, we need to make our communities walkable and bikeable
Date: Tuesday, April 26, 2022 11:10:25 AM

Dear Land Conservation and Development Commission,

We need to strengthen our communities by making them more accessible for all. We can do that and clean the air, plus provide healthy activities! I'm writing to ask you to do your best to create a brighter future as you go through the Climate-Friendly and Equitable Communities rulemaking process. Please help make our communities more walkable and bikeable, and improve public transit.

We have the opportunity to restructure our cities and make them easier places to walk, bike, and roll, and I urge you to take this once-in-a-generation opportunity to transform our communities.

Thank you.

Sincerely,
jane bartosz
1125 Genie Ct SE Salem, OR 97306-1105
janemir@msn.com

From: fnchaichi@everyactioncustom.com on behalf of [Farrah Chaichi](#)
To: [CFEC DLCD * DLCD](#)
Subject: We need safe walkable and bikeable communities
Date: Tuesday, April 26, 2022 1:46:15 PM

Dear Land Conservation and Development Commission,

I've lived in Beaverton my whole life and have always been scared to bike anywhere aside from my parents' neighborhood. I'm writing to ask you to please do your best to create a safer and brighter future as you go through the Climate-Friendly and Equitable Communities rulemaking process. Please help make our communities more walkable and bikeable, and improve public transit.

We have the opportunity to restructure our cities and make them easier places to walk, bike, and roll, and I urge you to take this once-in-a-generation opportunity to transform our communities.

Thank you.

Sincerely,
Farrah Chaichi
1187 SW Kiley Way Apt 36 Beaverton, OR 97006-5093
fnchaichi@gmail.com

From: tranian@everyactioncustom.com on behalf of [Martha Iancu](#)
To: [CFEC DLCD * DLCD](#)
Subject: Please prioritize making communities walkable and bikeable
Date: Tuesday, April 26, 2022 12:55:30 PM

Dear Land Conservation and Development Commission,

I am a citizen of Oregon, living in King City. I'm writing to ask you to prioritize making our communities more walkable and bikeable as you go through the Climate-Friendly and Equitable Communities rule-making process. Also focus on improved mass transit.

We have the opportunity to restructure our cities and make them easier places to walk, bike, and roll, and I urge you to take this once-in-a-generation opportunity to improve this aspect of our communities.

Thank you.

Sincerely,
Martha Iancu
15715 SW Queen Victoria Pl King City, OR 97224-2432
tranian@juno.com

From: michellej2@everyactioncustom.com on behalf of [Michelle Jordan](#)
To: [CFEC DLCD * DLCD](#)
Subject: Please support creation of walkable and bikeable communities
Date: Tuesday, April 26, 2022 12:37:31 PM

Dear Land Conservation and Development Commission,

I'm writing to ask you to do your best to create a brighter future as you go through the Climate-Friendly and Equitable Communities rulemaking process. Please help make our communities more walkable and bikeable, and improve public transit.

We have the opportunity to restructure our cities and make them easier places to walk, bike, and roll, and I urge you to take this once-in-a-generation opportunity to transform our communities.

Imagine a community in which one could work, shop, and enjoy amenities without having to drive a polluting vehicle and struggle to find parking!

Thank you.

Sincerely,
Michelle Jordan
720 Avenue G Unit D Seaside, OR 97138-6624
michellej2@charter.net

From: mintkeski@everyactioncustom.com on behalf of [Walt Mintkeski](#)
To: [CFEC DLCD * DLCD](#)
Subject: I support walkable and bikeable Communities
Date: Tuesday, April 26, 2022 12:01:40 PM

Dear Land Conservation and Development Commission,

I urge you to create a brighter future as you go through the Climate-Friendly and Equitable Communities rulemaking process. Please help make our communities more walkable and bikeable, and improve public transit.

We have the opportunity to restructure our cities and make them easier places to walk, bike, and roll, and I urge you to take this once-in-a-generation opportunity to transform our communities.

Thank you.

Sincerely,
Walt Mintkeski
6815 SE 31st Ave Portland, OR 97202-8633
mintkeski@juno.com

From: sue.wolling@everyactioncustom.com on behalf of [Susan Wolling](#)
To: [CFEC DLCD * DLCD](#)
Subject: We Need Walkable/Bikeable Communities
Date: Tuesday, April 26, 2022 11:58:03 AM

Dear Land Conservation and Development Commission,

It's becoming increasingly clear that if we want a livable Oregon, we need to do things differently. I am lucky enough to live in "middle" housing in downtown Eugene, so I drive so rarely that I have to clean the moss off my car--walking and bicycling is just easier and more pleasant.

But most people don't have the advantages I have. My friends drive everywhere they go--even driving to take their cars outside of town where they ride for fun--and it's getting more dangerous to ride a bike in town because traffic has gotten so much worse and aggressive. Meanwhile, many middle-aged people are stuck in their large single-family homes because they can't find any place affordable for downsizing, and young people despair of ever being able to buy a home. They can only hope that their rent won't increase beyond their means--and people of color face much steeper challenges.

These changes are happening very quickly, and we must respond equally quickly if we want Oregon to retain any of the things we love about it.

We need to restructure our cities and make them easier places to walk, bike, and roll, so I urge you to take this once-in-a-generation opportunity to transform our communities.

Thank you.

Sincerely,
Susan Wolling
108 High St Eugene, OR 97401-2306
sue.wolling@gmail.com

AGENDA ITEM 3
MAY 19-20, 2022-LCDC MEETING
EXHIBIT 27

98

From: NadiaEGardner@everyactioncustom.com on behalf of [Nadia Gardner](#)
To: [CFEC DLCD * DLCD](#)
Subject: Walkable and bikeable communities
Date: Wednesday, April 27, 2022 7:18:21 AM

Dear Land Conservation and Development Commission,

As a rural Oregonian, I'm writing to ask you to do your best to create a brighter future as you go through the Climate-Friendly and Equitable Communities rulemaking process. Please help make our communities more walkable and bikeable, and improve public transit.

We have the opportunity to restructure our cities and make them easier places to walk, bike, and roll, and I urge you to take this once-in-a-generation opportunity to transform our communities.

Thank you.

Sincerely,
Nadia Gardner
80285 Woodland Heights Rd Arch Cape, OR 97102-0100
NadiaEGardner@gmail.com

From: [Bart Mealer](#)
To: [JOHNSON Esther * DLCD](#)
Subject: CFEC
Date: Tuesday, May 10, 2022 9:48:05 AM

Dear DLCD,

I am writing in support of the Climate Friendly & Equitable Communities proposed rule.

Thank you for your work on behalf of Oregon.

Best,

Susy Lacer

Florence, OR

From: [David Anthes](#)
To: [CFEC DLCD * DLCD](#)
Subject: CFEC - Do not water down NACTO standards!
Date: Thursday, May 5, 2022 8:53:51 PM

I am asking the LCDC Commissioners to direct staff to include solely the NACTO Urban Bikeway Design Guide 2nd Edition as the safe harbor and clear standard for all on-street bicycle networks.

ODOT guidelines should not be applicable or referenced because ODOT has jurisdiction over state highways, and the connected bike network mandated by the rules should not be on state highways unless absolutely necessary. If it is necessary, and reference to an ODOT document is required, then the use of ODOT's guidelines should be only on that state highway segment. For all city streets, I am asking that the NACTO guidelines be used.

I believe the NACTO standards are better for Bend and will result in more usable bikeways and better opportunities for all to use other transport methods than cars. If more options are available then people will certainly use them.

Thank you!

David Anthes
Bend

AGENDA ITEM 3
MAY 19-20, 2022-LCDC MEETING
EXHIBIT 34

101

From: [Gail Sabbadini](#)
To: [CFEC DLCD * DLCD](#)
Subject: Rule adoption priorities
Date: Thursday, May 5, 2022 2:40:31 PM

Please adopt rules for urban planning that prioritize reduced generation of atmospheric carbon dioxide in Central Oregon.

Thank you,
Gail Sabbadini
Bend, OR

From: [Lucas Freeman](#)
To: [CFEC DLCD * DLCD](#)
Subject: CFEC - Do not water down NACTO standards!
Date: Monday, May 9, 2022 3:23:36 PM

Hey Y'all!

Just a quick note to ask that you direct staff to only use the NACTO Urban Bikeway Design Guide 2nd Edition as the safe harbor and clear standard for all on-street bicycle networks.

City streets need safer guidelines than what ODOT is proposing. A fully protected bike lane network should include streets of all speeds, not just ones at 30+mph. Cities should be mandated to use the safest option possible as laid out in NACTO; it's the only way we're gonna make the quantum leap to 50% mode share across Oregon. If people don't feel comfortable biking [protected bike lanes has been shown to be key to this], then we're gonna be perpetually stuck with car dependency.

Cheers!

Lucas Freeman
(541) 977-1454
Bend, Oregon

From: [Ariel Mendez](#)
To: [CFEC DLCD * DLCD](#); [JOHNSON Esther * DLCD](#)
Subject: Bicycle System Requirements 660-012-0610 - Remove ODOT Blueprint for Urban Design as safe harbor
Date: Tuesday, May 10, 2022 4:12:46 PM

Dear LCDC Commission Chair McArthur and Commission members,

I am hugely supportive of the work you all have been doing. You must be relieved to be nearing the end of the process.

It has come to my attention that the requirements for bicycle system planning and facilities standards currently have the option of being based on the Oregon Department of Transportation 2019 Blueprint for Urban Design.

Please, please, remove this design guide from your recommendations. Every single person who died on Oregon DOT roads in Bend from 2015 to 2019 was walking or biking. Let that sink in for a moment.

Yet when Oregon DOT led efforts to “[address critical gaps for walking and biking on the state system](#)” in October 2021, not a single project on the list was in Central Oregon.

The NACTO design guides are a much better reference if we want to actually focus on the experience of people walking, biking, and rolling in our cities.

Thank you for your attention and consideration.

Yours,
Ari Méndez
Bend, OR

From: [Mark Seabourne](#)
To: [CFEC DLCD * DLCD](#); [JOHNSON Esther * DLCD](#)
Subject: Re: Bicycle System Requirements 660-012-0610 - Remove ODOT Blueprint for Urban Design as safe harbor
Date: Tuesday, May 10, 2022 8:19:05 PM

Dear LCDC Commission Chair McArthur and Commission members:

I am appreciative of the Climate Friendly and Equitable Communities rulemaking and see the rules moving in the right direction for people who bike and roll in my community. I would be excited to fully support the transportation rules if:

1. The ODOT Blueprint for Urban Design is removed; and
2. The rules make it clear cities and counties may adopt other standards that are comparable or better than the two NACTO safe harbors, in anticipation of the new NACTO design guide that will be released in the coming year.

I am asking the Commission to revise this rule as follows to ensure this rulemaking's bicycle system requirements are not only equitable, but will actually help us meet our climate goals:

*(5) Cities and counties shall adopt standards for bicycle system planning and facilities that will result in a safe, low stress, and comfortable experience for people of all ages and abilities. Cities and counties may adopt standards **with comparable or better outcomes than, or are based on:***

*(a) The Urban Bikeway Design Guide, second edition, published by the National Association of City Transportation Officials; **and***

(b) Designing for All Ages & Abilities, December 2017, published by the National Association of City Transportation Officials; and

(c) The Blueprint for Urban Design, 2019, published by the Oregon Department of Transportation.

The goals of the bicycle system requirements is *completely undermined* by allowing the broad inclusion of [ODOT's Blueprint for Urban Design](#) as an additional safe harbor alongside the NACTO standards. We are asking the Commission to remove the reference to the ODOT manual because:

1. There was clear consensus in support of the NACTO standards amongst both City officials and community based organizations at the last rules advisory committee

meeting. No one other than ODOT has proposed the ODOT standards as a safe harbor.

2. ODOT has jurisdiction over and expertise in state highways and not local city streets. ODOT's manual specifically states it "documents the urban design practices and guidance for ODOT facilities and projects" (see preface). NACTO is an association of 89 major North American cities and transit agencies whose mission is to build cities as places for people, with safe, sustainable, accessible, and equitable transportation choices that support a strong economy and vibrant quality of life. A design guide for highways and ODOT facilities does not have the appropriate lens for local street design, whereas a design guide created by cities and transit agencies does.
3. ODOT's manual does not employ an equity lens and does not take into account what is needed to support priority populations, which is required by this rulemaking. The NACTO standards, on the other hand, have been intentionally crafted for a diverse range of people who have been historically excluded from the design perspective. This has been incorporated into the NACTO standard through the definition of "all ages and abilities" users, which the DCLD modeled their own definition after, and which has synergy with the priority populations identified in the rules.
4. ODOT's manual is at odds with the best practices set forth by NACTO – for example, NACTO requires a protected bike lane on a street signed 25 mph on the bike network, whereas the ODOT manual only requires protected bike lanes on a street signed 30 or 35 mph or more (see page 98). Vehicle speed and lack of protected bike lanes are some of the biggest barriers to shifting people from driving to biking, which is necessary to achieve our climate goals.
5. ODOT's manual is not actually a "standard," but rather has considerations for planners to take into account. Even if cities followed the ODOT manual, there is so much discretion allowed that there is no guarantee that the resulting network would be "safe, low stress, and comfortable experience for people of all ages and abilities." Using Figure 3-7 and Table 3-7 found on pages 98-99, planners are presented with a menu of choices available based on speed and volume of a street. But in the example of the 30 mph column on Figure 3-7, you can use a Tier 1 (separated bikeway) or Tier 2 (painted bike lane), and there is no guideline for which must be used and it is up to the discretion of the planner. In addition, on a street that is 25 mph regardless of volume of traffic or urban context, a sharrow is an acceptable "bike facility" according to the ODOT manual. [Sharrows may actually increase the risk of injury to people who bike](#). According to Figure 3-6, when selecting a preferred bikeway type it is allowed to "downgrade bikeway type with no parallel route" at any point if a planner decides a design is not feasible.

6. ODOT manual should not be applicable or referenced because ODOT has jurisdiction over state highways, and the connected bike network mandated by the rules should not be on state highways unless absolutely necessary. If reference to an ODOT document is required, then the use of ODOT's guidelines should be only on state highway segments.

Sincerely,
Mark Seabourne
Bend OR

From: [Julie Nye](#)
To: [CFEC DLCD * DLCD](#); [JOHNSON Esther * DLCD](#); [Senator Merkley@merkley.senate.gov](mailto:Senator_Merkley@merkley.senate.gov)
Subject: Bicycle System Requirements 660-012-0610 - Remove ODOT Blueprint for Urban Design as safe harbor
Date: Wednesday, May 11, 2022 8:46:45 AM

May 11, 2022

Land Conservation and Development Commission
Department of Land Conservation and Development
Attn: LCDC Commissioners, Bill Holstrom, Kevin Young
635 Capitol Street NE, Suite 150
Salem, OR 97301

Dear LCDC Commission Chair McArthur and Commission Members:

I appreciate the Climate Friendly and Equitable Communities rulemaking and see the rules moving in the right direction for people who bike and roll in my community (Deschutes County). I would be excited to fully support the transportation rules if:

1. The ODOT Blueprint for Urban Design is removed; and
2. The rules make it clear that cities and counties may adopt other standards that are comparable or better than the two NACTO safe harbors, in anticipation of the new NACTO design guide that will be released in the coming year.

I am asking the Commission to revise this rule as follows to ensure this rulemaking's bicycle system requirements are not only equitable but will actually help us meet our climate goals:

*(5) Cities and counties shall adopt standards for bicycle system planning and facilities that will result in a safe, low stress, and comfortable experience for people of all ages and abilities. Cities and counties may adopt standards **with comparable or better outcomes than, or are based on**:*

*(a) The Urban Bikeway Design Guide, second edition, published by the National Association of City Transportation Officials; **and***

*(b) Designing for All Ages & Abilities, December 2017, published by the National Association of City Transportation Officials; **and***

(c) The Blueprint for Urban Design, 2019, published by the Oregon Department of Transportation.

The goals of the bicycle system requirements are *completely undermined* by allowing the broad inclusion of [ODOT's Blueprint for Urban Design](#) as an additional safe harbor alongside the NACTO standards. We are asking the Commission to remove the reference to the ODOT manual because:

1. There was clear consensus in support of the NACTO standards amongst both City officials and community-based organizations at the last rules advisory committee meeting. No one other than ODOT has proposed the ODOT standards as a safe harbor.
2. ODOT has jurisdiction over and expertise in state highways and not local city streets. ODOT's manual specifically states it "documents the urban design practices and guidance for ODOT facilities and projects" (see preface). NACTO is an association of 89 major North American cities and transit agencies whose mission is to build cities as places for people, with safe, sustainable, accessible, and equitable transportation choices that support a strong economy and vibrant quality of life. A design guide for highways and ODOT facilities does not have the appropriate lens for local street design, whereas a design guide created by cities and transit agencies does.
3. ODOT's manual does not employ an equity lens and does not take into account what is needed to support priority populations, which is required by this rulemaking. The NACTO standards, on the other hand, have been intentionally crafted for a diverse range of people who have been historically excluded from the design perspective. This has been incorporated into the NACTO standard through the definition of "all ages and abilities" users, which the DCLD modeled their own definition after, and which has synergy with the priority populations identified in the rules.
4. ODOT's manual is at odds with the best practices set forth by NACTO – for example, NACTO requires a protected bike lane on a street signed 25 mph on the bike network, whereas the ODOT manual only requires protected bike lanes on a street signed 30 or 35 mph or more (see page 98). Vehicle speed and lack of protected bike lanes are some of the biggest barriers to shifting people from driving to biking, which is necessary to achieve our climate goals.
5. ODOT's manual is not actually a "standard," but rather has considerations for planners to take into account. Even if cities followed the ODOT manual, there is so much discretion allowed that there is no guarantee that the resulting network would be a "safe, low stress, and comfortable experience for people of all ages and abilities." Using Figure 3-7 and Table 3-7 found on pages 98-99, planners are presented with a menu of choices available based on the speed and volume of a street. But in the example of the 30 mph column in Figure 3-7, you can use a Tier 1

(separated bikeway) or Tier 2 (painted bike lane), and there is no guideline for which must be used and it is up to the discretion of the planner. In addition, on a street that is 25 mph regardless of the volume of traffic or urban context, a sharrow is an acceptable “bike facility” according to the ODOT manual. [Sharrows may actually increase the risk of injury to people who bike](#). According to Figure 3-6, when selecting a preferred bikeway type it is allowed to “downgrade bikeway type with no parallel route” at any point if a planner decides a design is not feasible.

6.

ODOT manual should not be applicable or referenced because ODOT has jurisdiction over state highways, and the connected bike network mandated by the rules should not be on state highways unless absolutely necessary. If reference to an ODOT document is required, then the use of ODOT’s guidelines should be only on state highway segments.

Sincerely,

Julie Nye

Bicyclist, pedestrian

From: [TAYLOR Casaria * DLCD](#)
To: [JOHNSON Esther * DLCD](#)
Subject: FW: Safe Bike Routes = NACTO guidelines
Date: Wednesday, May 11, 2022 10:18:53 AM

For the CFEC packet



Casaria Taylor

Rules, Records, and Policy Coordinator | Director's Office
Pronouns: she/her
Cell: 971-600-7699 | Main: 503-373-0050
casaria.taylor@dlcd.oregon.gov | www.oregon.gov/LCD

From: Hal Wershow <haroldwershow@gmail.com>
Sent: Wednesday, May 11, 2022 9:54 AM
To: CFEC DLCD * DLCD <DLCD.CFEC@dlcd.oregon.gov>
Subject: Safe Bike Routes = NACTO guidelines

Hello,

My name is Hal Wershow, I'm a resident of Bend, and I'm a daily bike commuter (rain, snow or shine). I am asking the LCDC Commissioners to direct staff to include solely the **NACTO Urban Bikeway Design Guide 2nd Edition** as the safe harbor and clear standard for all on-street bicycle networks. This is important to me because bikes are the best answer we have to reducing traffic congestion and carbon emissions while increasing our health and sense of community connection. Unfortunately most of my community does not feel safe biking the streets because our streets are designed for cars, not bikes.

Specifically, ODOT guidelines should not be applicable or referenced because ODOT has jurisdiction over state highways, and the connected bike network mandated by the rules should not be on state highways unless absolutely necessary. If it is necessary, and reference to an ODOT document is required, then the use of ODOT's guidelines should be only on that state highway segment. For all city streets, I am asking that the NACTO guidelines be used.

Thank you for your consideration,

Cheers,
Hal

From: [Laura Camacho](#)
To: [CFEC DLCD * DLCD](#); [JOHNSON Esther * DLCD](#)
Subject: Re: Bicycle System Requirements 660-012-0610 - Remove ODOT Blueprint for Urban Design as safe harbor
Date: Wednesday, May 11, 2022 11:22:28 AM

Dear LCDC Commission Chair McArthur and Commission members:

I'm copy/pasting this letter because people whom I trust to know far more about it than I have vetted it. I'm avidly interested in seeing our cities and towns more bike-safe (not just bike "friendly"), so that we can reduce our reliance on fossil fuels and keep our citizens healthy and connected to our wonderful outdoor playground, even in town.

I am appreciative of the Climate Friendly and Equitable Communities rulemaking and see the rules moving in the right direction for people who bike and roll in my community. I would be excited to fully support the transportation rules if:

1. The ODOT Blueprint for Urban Design is removed; and
2. The rules make it clear cities and counties may adopt other standards that are comparable or better than the two NACTO safe harbors, in anticipation of the new NACTO design guide that will be released in the coming year.

I am asking the Commission to revise this rule as follows to ensure this rulemaking's bicycle system requirements are not only equitable, but will actually help us meet our climate goals:

*(5) Cities and counties shall adopt standards for bicycle system planning and facilities that will result in a safe, low stress, and comfortable experience for people of all ages and abilities. Cities and counties may adopt standards **with comparable or better outcomes than, or are based on:***

*(a) The Urban Bikeway Design Guide, second edition, published by the National Association of City Transportation Officials; **and***

(b) Designing for All Ages & Abilities, December 2017, published by the National Association of City Transportation Officials

The goals of the bicycle system requirements is completely undermined by allowing the broad inclusion of [ODOT's Blueprint for Urban Design](#) as an additional safe harbor alongside the NACTO standards. We are asking the Commission to remove the reference to the ODOT manual because:

1. There was clear consensus in support of the NACTO standards amongst both City officials and community based organizations at the last rules advisory committee meeting. No one other than ODOT has proposed the ODOT standards as a safe harbor.
2. ODOT has jurisdiction over and expertise in state highways and not local city streets. ODOT's manual specifically states it "documents the urban design practices and guidance for ODOT facilities and projects" (see preface). NACTO is an association of 89 major North American cities and transit agencies whose mission is to build cities as places for people, with safe, sustainable, accessible, and equitable transportation choices that support a strong economy and vibrant quality of life. A design guide for highways and ODOT facilities does not have the appropriate lens for local street design, whereas a design guide created by cities and transit agencies does.
3. ODOT's manual does not employ an equity lens and does not take into account what is needed to support priority populations, which is required by this rulemaking. The NACTO standards, on the other hand, have been intentionally crafted for a diverse range of people who have been historically excluded from the design perspective. This has been incorporated into the NACTO standard through the definition of "all ages and abilities" users, which the DCLD modeled their own definition after, and which has synergy with the priority populations identified in the rules.
4. ODOT's manual is at odds with the best practices set forth by NACTO – for example, NACTO requires a protected bike lane on a street signed 25 mph on the bike network, whereas the ODOT manual only requires protected bike lanes on a street signed 30 or 35 mph or more (see page 98). Vehicle speed and lack of protected bike lanes are some of the biggest barriers to shifting people from driving to biking, which is necessary to achieve our climate goals.
5. ODOT's manual is not actually a "standard," but rather has considerations for planners to take into account. Even if cities followed the ODOT manual, there is so much discretion allowed that there is no guarantee that the resulting network would be "safe, low stress, and comfortable experience for people of all ages and abilities." Using Figure 3-7 and Table 3-7 found on pages 98-99, planners are presented with a menu of choices available based on speed and volume of a street. But in the example of the 30 mph column on Figure 3-7, you can use a Tier 1 (separated bikeway) or Tier 2 (painted bike lane), and there is no guideline for which must be used and it is up to the discretion of the planner. In addition, on a street that is 25 mph regardless of volume of traffic or urban context, a sharrow is an acceptable "bike facility" according to the ODOT manual. [Sharrows may actually increase the risk of](#)

[injury to people who bike](#). According to Figure 3-6, when selecting a preferred bikeway type it is allowed to “downgrade bikeway type with no parallel route” at any point if a planner decides a design is not feasible.

6. ODOT manual should not be applicable or referenced because ODOT has jurisdiction over state highways, and the connected bike network mandated by the rules should not be on state highways unless absolutely necessary. If reference to an ODOT document is required, then the use of ODOT’s guidelines should be only on state highway segments.

Sincerely,
Laura Camacho
Bend, Oregon

From: [Kim Ely](#)
To: [CFEC DLCD * DLCD](#); [JOHNSON Esther * DLCD](#)
Subject: Re: Bicycle System Requirements 660-012-0610
Date: Wednesday, May 11, 2022 11:43:16 AM

11 May 2022

sent via:

DLCD.CFEC@dlcd.oregon.gov

esther.johnson@dlcd.oregon.gov

Land Conservation and Development Commission
Department of Land Conservation and Development
Attn: LCDC Commissioners, Bill Holstrom, Kevin Young
635 Capitol Street NE, Suite 150
Salem, OR 97301

Re: Bicycle System Requirements 660-012-0610 - Remove ODOT Blueprint for Urban Design as safe harbor

Dear LCDC Commission Chair McArthur and Commission members:

I am appreciative of the Climate Friendly and Equitable Communities rulemaking and see the rules moving in the right direction for people who bike and roll in my community. I would be excited to fully support the transportation rules if:

1. The ODOT Blueprint for Urban Design is removed; and
2. The rules make it clear cities and counties may adopt other standards that are comparable or better than the two NACTO safe harbors, in anticipation of the new NACTO design guide that will be released in the coming year.

I am asking the Commission to revise this rule as follows to ensure this rulemaking's bicycle system requirements are not only equitable, but will actually help us meet our climate goals:

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(b) Designing for All Ages & Abilities, December 2017, published by the National Association of City Transportation Officials; and

(c) The Blueprint for Urban Design, 2019, published by the Oregon Department of Transportation.

The goals of the bicycle system requirements is *completely undermined* by allowing the broad inclusion of [ODOT's Blueprint for Urban Design](#) as an additional safe harbor alongside the NACTO standards. We are asking the Commission to remove the reference to the ODOT manual because:

1. There was clear consensus in support of the NACTO standards amongst both City officials and community based organizations at the last rules advisory committee meeting. No one other than ODOT has proposed the ODOT standards as a safe harbor.
2. ODOT has jurisdiction over and expertise in state highways and not local city streets. ODOT's manual specifically states it "documents the urban design practices and guidance for ODOT facilities and projects" (see preface). NACTO is an association of 89 major North American cities and transit agencies whose mission is to build cities as places for people, with safe, sustainable, accessible, and equitable transportation choices that support a strong economy and vibrant quality of life. A design guide for highways and ODOT facilities does not have the appropriate lens for local street design, whereas a design guide created by cities and transit agencies does.
3. ODOT's manual does not employ an equity lens and does not take into account what is needed to support priority populations, which is required by this rulemaking. The NACTO standards, on the other hand, have been intentionally crafted for a diverse range of people who have been historically excluded from the design perspective. This has been incorporated into the NACTO standard through the definition of "all ages and abilities" users, which the DCLD modeled their own definition after, and which has synergy with the priority populations identified in the rules.
4. ODOT's manual is at odds with the best practices set forth by NACTO – for example, NACTO requires a protected bike lane on a street signed 25 mph on the bike network, whereas the ODOT manual only requires protected bike lanes on a street signed 30 or 35 mph or more (see page 98). Vehicle speed and lack of protected bike lanes are some of the biggest barriers to shifting people from driving to biking, which is necessary to achieve our climate goals.
- 5.

ODOT's manual is not actually a "standard," but rather has considerations for planners to take into account. Even if cities followed the ODOT manual, there is so much discretion allowed that there is no guarantee that the resulting network would be "safe, low stress, and comfortable experience for people of all ages and abilities." Using Figure 3-7 and Table 3-7 found on pages 98-99, planners are presented with a menu of choices available based on speed and volume of a street. But in the example of the 30 mph column on Figure 3-7, you can use a Tier 1 (separated bikeway) or Tier 2 (painted bike lane), and there is no guideline for which must be used and it is up to the discretion of the planner. In addition, on a street that is 25 mph regardless of volume of traffic or urban context, a sharrow is an acceptable "bike facility" according to the ODOT manual. [Sharrows may actually increase the risk of injury to people who bike](#). According to Figure 3-6, when selecting a preferred bikeway type it is allowed to "downgrade bikeway type with no parallel route" at any point if a planner decides a design is not feasible.

6. ODOT manual should not be applicable or referenced because ODOT has jurisdiction over state highways, and the connected bike network mandated by the rules should not be on state highways unless absolutely necessary. If reference to an ODOT document is required, then the use of ODOT's guidelines should be only on state highway segments.

Sincerely,
Kim Ely
Bend, Oregon

AGENDA ITEM 3
MAY 19-20, 2022-LCDC MEETING
EXHIBIT 60

117

From: [Steve Johnson](#)
To: [JOHNSON Esther * DLCD](#)
Subject: Please go ahead with CFEC rules
Date: Wednesday, May 11, 2022 1:40:12 PM

Dear Commission LCDC Staff,

I am a small business owner who is looking forward to more walkable and bikeable locations. Our customers currently struggle to walk our bike to our location creating an inequitable situation favoring those with the resources to drive. We would love to have stronger bike zones and more walkability to our business. I deleted the drivel that NFIB out here, you'll probably read it in the Donna of other form letters you'll get. I assure you I am a real person typing this and support the new rules.

Sincerely,

Steve Johnson
1311 NE Butler Market Rd
Bend, OR 97701
steve@highmountainmist.com



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Jenny Ulum
Sue Wolling

Staff

Rob Zako,
executive director
Claire Roth,
safe streets coordinator
Colin Hill,
policy analyst intern

May 11, 2022

DELIVERED VIA EMAIL

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

Cc: Greater Eugene Area Riders (GEARs)

**Re: Bicycle System Requirements OAR 660-012-0610 — Remove ODOT
Blueprint for Urban Design as Safe Harbor**

Dear LCDC Commission Chair McArthur and Commission members:

We appreciate the [Climate Friendly and Equitable Communities](#) rulemaking and see the rules moving in the right direction for people who bike and roll in our community. We would be excited to fully support the transportation rules if:

1. The ODOT Blueprint for Urban Design is removed; and
2. The rules make it clear cities and counties may adopt other standards that are comparable or better than the two NACTO safe harbors, in anticipation of the new NACTO design guide that will be released in the coming year.

We ask the Commission to revise this rule as follows to ensure this rulemaking’s bicycle system requirements are not only equitable, but will actually help us meet our climate goals:

*(5) Cities and counties shall adopt standards for bicycle system planning and facilities that will result in a safe, low stress, and comfortable experience for people of all ages and abilities. Cities and counties may adopt standards **with comparable or better outcomes than, or are based on:***

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(b) Designing for All Ages & Abilities, December 2017, published by the National Association of City Transportation Officials; ~~and~~

~~(c) The Blueprint for Urban Design, 2019, published by the Oregon Department of Transportation.~~

The goals of the bicycle system requirements is completely undermined by allowing the broad inclusion of [ODOT’s Blueprint for Urban Design](#) as an additional safe harbor alongside the NACTO standards. We are asking the Commission to remove the reference to the ODOT manual because:

1. There was clear consensus in support of the NACTO standards amongst both City officials and community-based organizations at the last rules advisory committee meeting. No one other than ODOT has proposed the ODOT standards as a safe harbor.

Building a successful community by bringing people together to promote transportation options, safe streets, and walkable neighborhoods.

Better Eugene-Springfield Transportation • PO Box 773, Eugene, OR 97440 • 541-343-5201

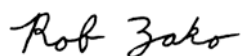
info@best-oregon.org • www.best-oregon.org • www.facebook.com/BetterEugeneSpringfieldTransportation

BEST is a 501(c)(3) nonprofit. Contributions are tax-deductible to the extent the law allows. Tax ID #42-1661720.

2. ODOT has jurisdiction over and expertise in state highways and not local city streets. ODOT's manual specifically states it "documents the urban design practices and guidance for ODOT facilities and projects" (see preface). NACTO is an association of 89 major North American cities and transit agencies whose mission is to build cities as places for people, with safe, sustainable, accessible, and equitable transportation choices that support a strong economy and vibrant quality of life. A design guide for highways and ODOT facilities does not have the appropriate lens for local street design, whereas a design guide created by cities and transit agencies does.
3. ODOT's manual does not employ an equity lens and does not take into account what is needed to support priority populations, which is required by this rulemaking. The NACTO standards, on the other hand, have been intentionally crafted for a diverse range of people who have been historically excluded from the design perspective. This has been incorporated into the NACTO standard through the definition of "all ages and abilities" users, which the DCLD modeled their own definition after, and which has synergy with the priority populations identified in the rules.
4. ODOT's manual is at odds with the best practices set forth by NACTO – for example, NACTO requires a protected bike lane on a street signed 25 mph on the bike network, whereas the ODOT manual only requires protected bike lanes on a street signed 30 or 35 mph or more (see page 98). Vehicle speed and lack of protected bike lanes are some of the biggest barriers to shifting people from driving to biking, which is necessary to achieve our climate goals.
5. ODOT's manual is not actually a "standard," but rather has considerations for planners to take into account. Even if cities followed the ODOT manual, there is so much discretion allowed that there is no guarantee that the resulting network would be "safe, low stress, and comfortable experience for people of all ages and abilities." Using Figure 3-7 and Table 3-7 found on pages 98-99, planners are presented with a menu of choices available based on speed and volume of a street. But in the example of the 30 mph column on Figure 3-7, you can use a Tier 1 (separated bikeway) or Tier 2 (painted bike lane), and there is no guideline for which must be used and it is up to the discretion of the planner. In addition, on a street that is 25 mph regardless of volume of traffic or urban context, a sharrow is an acceptable "bike facility" according to the ODOT manual. [Sharrows may actually increase the risk of injury to people who bike](#). According to Figure 3-6, when selecting a preferred bikeway type it is allowed to "downgrade bikeway type with no parallel route" at any point if a planner decides a design is not feasible.
6. ODOT manual should not be applicable or referenced because ODOT has jurisdiction over state highways, and the connected bike network mandated by the rules should not be on state highways unless absolutely necessary. If reference to an ODOT document is required, then the use of ODOT's guidelines should be only on state highway segments.

Thank you for all your efforts. Please let us know if you have any questions.

For BEST,



Rob Zako, Executive Director
541-343-5201
rob@best-oregon.org

From: [Heather Lynch](#)
To: [CFEC DLCD * DLCD](#); [JOHNSON Esther * DLCD](#)
Subject: Public Comment re: new state transportation rules
Date: Wednesday, May 11, 2022 2:33:20 PM

Heather Lynch
20119 Reed Lane, Bend OR 97702

5/11/2022

sent via:

DLCD.CFEC@dlcd.oregon.gov
esther.johnson@dlcd.oregon.gov

Land Conservation and Development Commission
Department of Land Conservation and Development
Attn: LCDC Commissioners, Bill Holstrom, Kevin Young
635 Capitol Street NE, Suite 150
Salem, OR 97301

Re: Bicycle System Requirements 660-012-0610 - Remove ODOT Blueprint for Urban Design as safe harbor

Dear LCDC Commission Chair McArthur and Commission members:

I am appreciative of the Climate Friendly and Equitable Communities rulemaking and see the rules moving in the right direction for people who bike and roll in my community. I would be excited to fully support the transportation rules if:

1. The ODOT Blueprint for Urban Design is removed; and
2. The rules make it clear cities and counties may adopt other standards that are comparable or better than the two NACTO safe harbors, in anticipation of the new NACTO design guide that will be released in the coming year.

I am asking the Commission to revise this rule as follows to ensure this rulemaking's bicycle system requirements are not only equitable, but will actually help us meet our climate goals:

*(5) Cities and counties shall adopt standards for bicycle system planning and facilities that will result in a safe, low stress, and comfortable experience for people of all ages and abilities. Cities and counties may adopt standards **with comparable or better outcomes than, or are based on:***

*(a) The Urban Bikeway Design Guide, second edition, published by the National Association of City Transportation Officials; **and***

(b) Designing for All Ages & Abilities, December 2017, published by the National Association of City Transportation Officials

The goals of the bicycle system requirements is *completely undermined* by allowing the broad inclusion of [ODOT's Blueprint for Urban Design](#) as an additional safe harbor alongside the NACTO standards. We are asking the Commission to remove the reference to the ODOT manual because:

1. There was clear consensus in support of the NACTO standards amongst both City officials and community-based organizations at the last rules advisory committee meeting. No one other than ODOT has proposed the ODOT standards as a safe harbor.
2. ODOT has jurisdiction over and expertise in state highways and not local city streets. ODOT's manual specifically states it "documents the urban design practices and guidance for ODOT facilities and projects" (see preface). NACTO is an association of 89 major North American cities and transit agencies whose mission is to build cities as places for people, with safe, sustainable, accessible, and equitable transportation choices that support a strong economy and vibrant quality of life. A design guide for highways and ODOT facilities does not have the appropriate lens for local street design, whereas a design guide created by cities and transit agencies does.
3. ODOT's manual does not employ an equity lens and does not take into account what is needed to support priority populations, which is required by this rulemaking. The NACTO standards, on the other hand, have been intentionally crafted for a diverse range of people who have been historically excluded from the design perspective. This has been incorporated into the NACTO standard through the definition of "all ages and abilities" users, which the DCLD modeled their own definition after, and which has synergy with the priority populations identified in the rules.
4. ODOT's manual is at odds with the best practices set forth by NACTO – for example, NACTO requires a protected bike lane on a street signed 25 mph on the bike network, whereas the ODOT manual only requires protected bike lanes on a street signed 30 or 35 mph or more (see page 98). Vehicle speed and lack of protected bike lanes are some of the biggest barriers to shifting people from driving to biking, which is necessary to achieve our climate goals.
5. ODOT's manual is not actually a "standard," but rather has considerations for planners to take into account. Even if cities followed the ODOT manual, there is so much discretion allowed that there is no guarantee that the resulting network would be "safe, low stress, and comfortable experience for people of all ages and abilities." Using Figure 3-7 and Table 3-7 found on pages 98-99, planners are presented with a menu of choices available based on speed and volume of a street. But in the example of the 30 mph column on Figure 3-7, you can use a Tier 1 (separated bikeway) or Tier 2 (painted bike lane), and there is no guideline for which must be used and it is up to the discretion of the planner. In addition, on a street that is 25 mph regardless of volume of traffic or urban context, a sharrow is an acceptable "bike facility" according to the ODOT manual. [Sharrows may actually increase the risk of injury to people who bike](#). According to Figure 3-6, when selecting a preferred bikeway type it is allowed to "downgrade bikeway type with no parallel route" at any point if a planner decides a design is not feasible.
6. The ODOT manual should not be applicable or referenced because ODOT has jurisdiction over state highways, and the connected bike network mandated by the

rules should not be on state highways unless absolutely necessary. If reference to an ODOT document is required, then the use of ODOT's guidelines should be only on state highway segments.

Sincerely,

Heather Lynch

Bend resident, Certified Rehabilitation Counselor and active member of the cycling community

From: [Jana Hemphill](#)
To: [CFEC DLCD * DLCD](#); [JOHNSON Esther * DLCD](#)
Subject: Public comment on climate-friendly and equitable communities rulemaking
Date: Wednesday, May 11, 2022 9:33:18 PM

Dear Land Conservation and Development Commission,

My name is Jana Hemphill and I live in Bend, Oregon. I am on the Board of Directors of Bend Bikes, a grassroots nonprofit that advocates on behalf of community members who live, work, and bike in Bend. We advocate for the safety of people who ride bikes and envision a future with a comprehensive network of bike-friendly routes in Bend. We believe that our community requires strong leadership that understands inclusive, sustainable, and equitable transportation planning.

Today, I am asking the LCDC Commissioners to direct staff to include solely the NACTO Urban Bikeway Design Guide 2nd Edition as the safe harbor and clear standard for all on-street bicycle networks. These guidelines are critical to providing bicyclists (and potential bicyclists!) a safe network of bike-friendly routes no matter their destination. I want safe routes for students biking to school. I want safe routes for bicyclists heading to the grocery store, restaurants, local small businesses, and events. I want safe routes for families biking together to the library, nearby parks, the pool, and local trails. I hope that you want these same things for your community and for the greater state of Oregon.

I am incredibly concerned about the consideration of ODOT guidelines being included as part of the rulemaking. ODOT guidelines should not be applicable or referenced because ODOT has jurisdiction over state highways, and the connected bike network mandated by the rules should not be on state highways unless absolutely necessary. If it is necessary, and reference to an ODOT document is required, then the use of ODOT's guidelines should be only on that state highway segment. **ODOT guidelines simply do not protect cyclists.**

Again, I urge you to only use the NACTO guidelines for city streets and not include ODOT guidelines. By taking this opportunity to truly invest in climate-friendly and equitable communities, you can help guide Oregon and its communities towards a safe, climate-friendly, and equitable place both now and into the future.

Thank you,
Jana Hemphill
Bend Bikes Board Member

Jana Hemphill
she/her/hers ([why pronouns matter](#))

Board of Directors

BEND BIKES

Advocating for the safety of people who ride bikes

From: [BikeLoud PDX](#)
To: [CFEC DLCD * DLCD](#); [JOHNSON Esther * DLCD](#)
Subject: Bicycle System Requirements 660-012-0610 - Remove ODOT Blueprint for Urban Design as safe harbor
Date: Wednesday, May 11, 2022 11:04:46 PM



May 11th 2022,

Dear LCDC Commission Chair McArthur and Commission members:

I am appreciative of the Climate Friendly and Equitable Communities rulemaking and see the rules moving in the right direction for people who bike and roll in my community. I would be excited to fully support the transportation rules if:

1. The ODOT Blueprint for Urban Design is removed; and
2. The rules make it clear cities and counties may adopt other standards that are comparable or better than the two NACTO safe harbors, in anticipation of the new NACTO design guide that will be released in the coming year.

I am asking the Commission to revise this rule as follows to ensure this rulemaking's bicycle system requirements are not only equitable, but will actually help us meet our climate goals:

*(5) Cities and counties shall adopt standards for bicycle system planning and facilities that will result in a safe, low stress, and comfortable experience for people of all ages and abilities. Cities and counties may adopt standards **with comparable or better outcomes than, or are based on:***

*(a) The Urban Bikeway Design Guide, second edition, published by the National Association of City Transportation Officials; **and***

(b) Designing for All Ages & Abilities, December 2017, published by the National

Association of City Transportation Officials; and

The goals of the bicycle system requirements is *completely undermined* by allowing the broad inclusion of [ODOT's Blueprint for Urban Design](#) as an additional safe harbor alongside the NACTO standards. We are asking the Commission to remove the reference to the ODOT manual because:

1. There was clear consensus in support of the NACTO standards amongst both City officials and community based organizations at the last rules advisory committee meeting. No one other than ODOT has proposed the ODOT standards as a safe harbor.
2. ODOT has jurisdiction over and expertise in state highways and not local city streets. ODOT's manual specifically states it "documents the urban design practices and guidance for ODOT facilities and projects" (see preface). NACTO is an association of 89 major North American cities and transit agencies whose mission is to build cities as places for people, with safe, sustainable, accessible, and equitable transportation choices that support a strong economy and vibrant quality of life. A design guide for highways and ODOT facilities does not have the appropriate lens for local street design, whereas a design guide created by cities and transit agencies does.
3. ODOT's manual does not employ an equity lens and does not take into account what is needed to support priority populations, which is required by this rulemaking. The NACTO standards, on the other hand, have been intentionally crafted for a diverse range of people who have been historically excluded from the design perspective. This has been incorporated into the NACTO standard through the definition of "all ages and abilities" users, which the DCLD modeled their own definition after, and which has synergy with the priority populations identified in the rules.
4. ODOT's manual is at odds with the best practices set forth by NACTO – for example, NACTO requires a protected bike lane on a street signed 25 mph on the bike network, whereas the ODOT manual only requires protected bike lanes on a street signed 30 or 35 mph or more (see page 98). Vehicle speed and lack of protected bike lanes are some of the biggest barriers to shifting people from driving to biking, which is necessary to achieve our climate goals.
5. ODOT's manual is not actually a "standard," but rather has considerations for planners to take into account. Even if cities followed the ODOT manual, there is so much discretion allowed that there is no guarantee that the resulting network would be "safe, low stress, and comfortable experience for people of all ages and abilities."

Using Figure 3-7 and Table 3-7 found on pages 98-99, planners are presented with a menu of choices available based on speed and volume of a street. But in the example of the 30 mph column on Figure 3-7, you can use a Tier 1 (separated bikeway) or Tier 2 (painted bike lane), and there is no guideline for which must be used and it is up to the discretion of the planner. In addition, on a street that is 25 mph regardless of volume of traffic or urban context, a sharrow is an acceptable “bike facility” according to the ODOT manual. [Sharrows may actually increase the risk of injury to people who bike](#). According to Figure 3-6, when selecting a preferred bikeway type it is allowed to “downgrade bikeway type with no parallel route” at any point if a planner decides a design is not feasible.

6.

ODOT manual should not be applicable or referenced because ODOT has jurisdiction over state highways, and the connected bike network mandated by the rules should not be on state highways unless absolutely necessary. If reference to an ODOT document is required, then the use of ODOT’s guidelines should be only on state highway segments.

Sincerely,

Kiel Johnson, Chair BikeLoud PDX

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BikeLoudPDX is an all-volunteer advocacy group; our mission is to make bicycling safe and accessible to everyone.

AGENDA ITEM 3
MAY 19-20, 2022-LCDC MEETING
EXHIBIT 92

128

From: [Matthew Orr](#)
To: [JOHNSON Esther * DLCD](#)
Subject: Climate friendly development
Date: Friday, May 13, 2022 1:59:16 PM

Climate friendly development is long overdue. There may be some bumps in the road along the way, but it is a road we all need to venture down together. Matt Orr PhD

Sent from my iPhone

AGENDA ITEM 3
MAY 19-20, 2022-LCDC MEETING
EXHIBIT 103

Subject:

Multiple copies of this form letter were received from the following individuals. One copy of the form letter is attached to this cover.

Date Received	Name
1	5/16/2022 Basey Klopp
2	5/16/2022 James Teeter
3	5/16/2022 Felix Felde
4	5/16/2022 Nick Rasmussen Robert Davis, Yamhill
5	5/16/2022 Neighborhood Association
6	5/16/2022 Tamara Houston
7	5/16/2022 Mark and Cynthia Chandler
8	5/16/2022 Hana Sant
9	5/16/2022 Rebecca Kay
10	5/16/2022 Joseph Craig
11	5/16/2022 Regan Gage
12	5/16/2022 Lucy Hitchcock
13	5/16/2022 Janell Brittain
14	5/16/2022 Emma Juth
15	5/16/2022 Carol Moorehead
16	5/16/2022 Arielle Ocel
17	5/16/2022 Connie Hutchison
18	5/16/2022 Kim Davis
19	5/16/2022 Mindi Larrabee
20	5/16/2022 Shami Zellers
21	5/16/2022 Peter Geiser
22	5/16/2022 Andrew Butz

AGENDA ITEM 3
MAY 19-20, 2022-LCDC MEETING
EXHIBIT 103

Dear Chair McArthur and LCDC Commissioners,

I strongly support the goal of DLCD's Climate-Friendly and Equitable Communities rulemaking to reduce greenhouse gas emissions and transform Oregon communities to be safe, equitable, sociable, and pleasant places where driving is not required and the amount of driving is reduced.

Please look at this recent [joint comment](#) from advocates across Oregon for the key elements that must be adopted in these rules, as well as the adjustments still needed. This will ensure this process delivers strong, implementable rules that effectively and urgently tackle climate change by reducing greenhouse gas emissions and creating more livable and equitable communities.

Please adopt rules that reflect this input at LCDC's CFEC hearing on May 19. Thank you for your service and consideration of these comments.

Sincerely,

Basey Klopp



Basey Klopp (she/her)
(541) 647-0008
[Bend Pollinator Pathway](#)

From: sugaylord@sbcglobal.net
To: [CFEC DLCD * DLCD](#); [JOHNSON Esther * DLCD](#)
Subject: Please adopt strong, clear, urgently implemented CFEC rules at May 19 hearing
Date: Monday, May 16, 2022 1:44:55 PM

Dear Chair McArthur and LCDC Commissioners,

I strongly support the goal of DLCD's Climate-Friendly and Equitable Communities rule-making to reduce greenhouse gas emissions and transform Oregon communities to be safe, equitable, sociable, and pleasant places where driving is not required and the amount of driving is reduced.

There are many communities, like mine in SE Bend Hidden Hills, that are grappling with a lack of rules in city/code development. I am a part of the SE Bend Neighbors for Responsible Development. We are working to hold the city planners accountable to the neighbors in our area and deny a permit to GP Energy who is seeking to build a gas station in our neighborhood. We do not want an un-safe, ill-conceived, environmental disaster (gas station) to be built in a CC coded neighborhood. A gas station will encourage driving, reduce community, increase toxic waste and unhealthy air quality, and burden the neighborhood for years to come.

Please look at this recent [joint comment](#) from advocates across Oregon for the key elements that must be adopted in these rules, as well as the adjustments still needed. This will ensure this process delivers strong, implementable rules that effectively and urgently tackle climate change by reducing greenhouse gas emissions and creating more livable and equitable communities.

Please adopt rules that reflect this input at LCDC's CFEC hearing on May 19. Thank you for your service and consideration of these comments.

Sincerely,

Susan Gaylord
60077 SE Ruby Peak Loop
Bend, OR 97702

From: [Connie Peterson](#)
To: [CFEC DLCD * DLCD](#); [JOHNSON Esther * DLCD](#)
Subject: Please adopt and implement strong CFEC rules at May 19 hearing
Date: Monday, May 16, 2022 2:42:08 PM

Dear Chair McArthur and LCDC Commissioners,

As a senior citizen and life-long Oregonian, I want to promote all actions that protect the place I love. We need policies that effectively and urgently tackle climate change, reduce greenhouse gas emissions and create more livable and equitable communities. Growth in Oregon is inevitable, but HOW we continue to grow matters!

I strongly support the goal of DLCD's Climate-Friendly and Equitable Communities rulemaking and support efforts underway to transform Oregon communities as more equitable, sociable, and pleasant places where driving is not required, or the need for driving is greatly reduced.

Because of work I have supported in Bend like the Climate Action Plan and Transportation Bond, I ask that you please complete the study of Climate Friendly Areas by June 30, 2023, with no alternative date extensions and include stronger language around the ability of cities and counties to adopt additional standards that are comparable or better than those proposed by NATCO. implementable rules that effectively and urgently tackle climate change by reducing greenhouse gas emissions and creating more livable and equitable communities.

Thank you,
Connie Peterson

--

Our lives begin to end the day we become silent about things that matter --Martin Luther King, Jr.

AGENDA ITEM 3
MAY 19-20, 2022-LCDC MEETING
EXHIBIT 108

133

From: [Kathryn Lincoln](#)
To: [JOHNSON Esther * DLCD](#); [CFEC DLCD * DLCD](#)
Subject: Adopt CFEC Rules, May 19 hearing
Date: Monday, May 16, 2022 3:33:53 PM

Dear Chair McArthur and LCDC Commissioners,

DLCD and staff have done a heroic job of drafting the Climate-Friendly and Equitable Communities rules to reduce greenhouse gas emissions by proposing communities that are friendly, clean and do not require gas-driven vehicles to get to work, play and shop. However, there is more we can do. We don't have much time - Some predict that the next TWO years will be critical in preventing rising temperatures from going over a point of no return. Because the situation is so urgent, changes in the draft rules pointed out in the joint comments from advocates across Oregon for key elements and deadlines in the rules are still needed. This will ensure this process delivers strong, implementable rules that effectively and urgently tackle climate change by reducing greenhouse gas emissions and creating more livable and equitable communities.

Please make the amendments suggested in the May 11 letter from 1000 Friends et. al. And remember - just adopting the rules will not be enough. They must be rigorously and equitably implemented to achieve the desired results.

Thank you.

Kathy Lincoln
Keizer, OR

From: [Bradley](#)
To: [JOHNSON Esther * DLCD](#)
Subject: Please adopt strong, clear, urgently implemented CFEC rules at May 19 hearing
Date: Monday, May 16, 2022 10:44:07 PM

Dear LCDC Commissioners

Please ensure that the final adopted package is not watered down. The adopted rules must be as powerful, implementable, and enforceable as possible. 4 floors and a corner store must be the goal, and the full removal of parking minimums is also a critical component to advancing a green future for our state.

Thanks you for all of the work you and the LCDC staff have put into the draft rules so far. Now in the last stretch I ask that you all don't shy away from it in the face of opposition from the profiteers of sprawl. We shouldn't trouble ourselves with the concerns of car dealerships and highway builders. Worry instead for the future of young kids alive today, who have a right to a world not wrecked by climate change.

Thanks,
Bradley Bondy
6640 SE 89th Ave,
Portland, Oregon
bradleybondy@bradleybondy.com

AGENDA ITEM 3
MAY 19-20, 2022-LCDC MEETING
EXHIBIT 113

Subject:

Multiple copies of this form letter were received from the following individuals. One copy of the form letter is attached to this cover.

Date Received	Name
1	5/16/2022 Jennifer Arnesen
2	5/16/2022 Susan Heath
3	5/17/2022 Becca Curtis
4	5/17/2022 Matt Kelly
5	5/17/2022 Elise Kukulka
6	5/17/2022 Katie Sox
7	5/17/2022 Ben Asher
8	5/17/2022 Neil Kagan

Dear Chair McArthur and LCDC Commissioners,

I strongly support the goal of DLCD's Climate-Friendly and Equitable Communities rulemaking to reduce greenhouse gas emissions and transform Oregon communities to be safe, equitable, sociable, and pleasant places where driving is not required and the amount of driving is reduced.

Please look at this recent [joint comment](#) from advocates across Oregon for the key elements that must be adopted in these rules, as well as the adjustments still needed. This will ensure this process delivers strong, implementable rules that effectively and urgently tackle climate change by reducing greenhouse gas emissions and creating more livable and equitable communities.

Please adopt rules that reflect this input at LCDC's CFEC hearing on May 19. Thank you for your service and consideration of these comments.

Sincerely,
Jennifer Jones Arnesen

From: sean@sixelre.com
To: [JOHNSON Esther * DLCD](#)
Cc: [BOYER Barbara * DLCD](#)
Subject: Thank you for your efforts / attempt at comment
Date: Tuesday, May 17, 2022 1:02:42 PM

Esther, cc: Barbara

I do not have time to submit a detailed letter of comment on your current efforts around the CFEC rules, and have not researched the specifics of what is being debated. On the other hand, I do have enough experience with my trade group to know that the organized pressure from OR's lobbying arm is generally wrong headed around climate and land use issues.

In an effort to support an alternative view from what you will hear from the real estate trade group, it should be made aware to those debating the issues that I and other reasonable real estate professionals are in support of land use regulation, and common sense changes and agreements needed to best prepare for changes coming to our state driven by the climate crisis.

Speaking for only myself and not the trade groups, I do not agree that Oregon Realtors or Eugene Area Realtors has made the best value calculation on best policy for our industry in regards to these issues, and their input should be tempered by knowledge that they do not always best represent the long term interests of many in the industry. From my understanding and experience, much of their messaging is driven by political ideology and attempts to shift costs onto others, rather than a fair consideration of the facts.

I am a real estate professional willing to speak up in support of existing land use regulation, fair allocation of development costs, and best policies to adapt our states regulations to climate crisis, and do so regularly. I am an enrolled indigenous tribal citizen with the Osage Nation, and have professional experience in agriculture (Yamhill County winery and organic vineyard operation) and real estate that allows me to speak with more expertise and understanding of the issues involved than some. I would be happy to continue this conversation in more detail if you or anyone else feels it might be helpful.

Regret I did not have time to prepare more detailed testimony prior to your upcoming meeting. Hoping for best outcome as possible, and thank you so much for your public service.

Best regards,

Sean Camblin

Principal Broker, Sixel Real Estate

Sean@SixelRE.com
Mobile: [541.525.4297](tel:541.525.4297)
Office: [541.654.0501](tel:541.654.0501)
Fax: [888.887.8165](tel:888.887.8165)



www.SIXELre.com

[870 W Centennial Blvd., Suite C](#)
[Springfield, OR 97477](#)

We are located at the intersection of W Centennial Blvd. and Rainbow Dr.

[Please take a moment to read this important Oregon Real Estate Agency Disclosure Pamphlet](#)

Licensed in the State of Oregon



AGENDA ITEM 3
MAY 19-20, 2022-LCDC MEETING
EXHIBIT 126

-----Original Message-----

From: Chuck Missar <MissarLLC@ordata.com>
Sent: Monday, May 16, 2022 1:31 PM
To: CFEC DLCD * DLCD <DLCD.CFEC@dlcd.oregon.gov>
Subject: Reduce Greenhouse gas emissions

Hi,

Yes, I'm doing a cut and paste! Thanks for your consideration.

Dear Chair McArthur and LCDC Commissioners,

I strongly support the goal of DLCD's Climate-Friendly and Equitable Communities rulemaking to reduce greenhouse gas emissions and transform Oregon communities to be safe, equitable, sociable, and pleasant places where driving is not required and the amount of driving is reduced.

Charles Missar

May 16, 2022

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

RE: PROPOSED CLIMATE FRIENDLY AND EQUITABLE COMMUNITIES RULES

Commissioners:

Despite a long process and good intentions, the proposed CFEC rules still fall short of directing the scale of changes to land use and transportation plans that are needed to meet state GHG reduction goals. Two changes - recommended by advocates over the last six months - would substantially improve the rules. These are requiring: (1) that transportation system plans meet adopted VMT reduction targets and (2) that cities adopt land use assumptions as part of CFA designation in 2024 that focus most new development in CFA.

Why these changes are needed

Meeting our GHG and VMT reduction goals requires that we plan for most new development in walkable, mixed use climate friendly areas. It also requires that we shift our approach to meeting transportation needs from expanding road capacity to remaking streets - especially in CFAs - to double or triple the share of trips made by walking, cycling and transit. Significant changes will be needed because existing plans take us in the wrong direction: they call for most new development in car-dependent areas. And the problem is not just zoning: TSPs include long lists of roadway expansion projects that, in combination with zoning, will facilitate more car-dependent development and high levels of VMT per capita. As currently written the proposed rules do too little to redirect future growth to climate friendly areas and will result in plan updates that fall well short of our goals to reduce VMT and GHG.

Two changes are critical to get us on track to achieve our emission reductions goals:

1. Require that all metropolitan area plans meet adopted VMT Targets

The primary goal of this rulemaking is to direct changes to plans to meet GHG and VMT reduction targets. Adopted targets - in place for more than a decade - call for reducing driving - VMT per capita - by 20-30%. The good news is that the rules do require the Portland Metropolitan area to plan to meet VMT targets.¹ Inexplicably though, the proposed rules would require that other metropolitan areas achieve as little as a 1% VMT reduction.² That's about what plans do now and it's far short of what's needed and required to implement the STS, Governor Brown's EO and state

¹ Rule 160(6) requires that Portland Metro meet adopted targets (in 660-044-0020(4)) which call for a 25-35% reduction in VMT per capita.

² Rule 160(4) allows adoption of TSPs only where "projected VMT per capita at the horizon year using the financially-constrained project list is lower than the estimated VMT per capita in the base year." "

GHG goals. In short, it amounts to planning **not** to meet the targets: it's planning to fail. Requiring only a 1% VMT reduction means we will neither make nor consider the scale of changes to land use and transportation plans that are needed to meet VMT reduction goals.

Proposed Rule Amendment: Amend Rule 160(5) to require that all metropolitan areas meet adopted VMT targets by requiring that “cities and counties may only adopt a transportation system plan if the vehicle miles traveled per capita at the horizon year using the financially-constrained project list meet the VMT reduction targets set forth in 660-044-0025(2).”

2. Require that CFA designation in 2024 include adoption of housing and employment allocations that accommodate most new development in CFAs

Although the proposed rules require local governments to adopt land use assumptions for CFAs³, the work program option allows cities to put this work off until 2027. Adoption of land use assumptions in 2024 - as part of the CFA designation work - is critical to redirect growth and infrastructure investments to support development in CFAs:

- Getting 30% of all housing in walkable mixed use areas - i.e. CFAs - requires that we get at least half of expected growth - i.e. new housing - in CFA type areas. That's because most cities are currently planning for only about 15% of all housing in such areas.⁴
- Delaying work on land use assumptions to 2027 means local governments will continue to implement existing plans that call for most new development to occur at relatively modest densities on mostly vacant land in outlying parts of urban areas rather than through infill, redevelopment or higher densities in close-in areas or along major transit routes. In addition, locals will prepare updates to housing, economic development and other plans that continue, rather than reverse, the trend of car dependent development.
- Providing “zoned capacity” to accommodate 30% of housing in CFAs will not be sufficient to redirect growth because (1) likely CFAs (downtowns and commercially zoned areas along major transit routes) are already generally zoned to allow multistory residential development and (2) because CFAs also need supporting public investments - in streets, parks and other public uses - to transform these areas into walkable mixed use areas. Until we plan for and invest in CFAs, development will continue to happen mostly in outlying areas, in large part because existing public facility plans will direct most new public investments to outlying, car-dependent areas.

Proposed Rule Amendment: Amend Rule 0012 (11) to require that cities and counties subject to 310 adopt future land use assumptions required by Rule 340 by June 30, 2024.

³ Rule 340 requires that cities and counties must develop and adopt future land use assumptions that direct proposed housing and employment growth to climate friendly areas when they prepare TSPs and when they designate climate friendly areas.

⁴ DLCDs 2018 analysis of adopted plans for 2035 found that most of the state's metropolitan area areas, other than Portland Metro, expect that only about 15% of all housing will be located in walkable, mixed use areas.

Aggressively implement the CFEC Rules

At the same time it adopts the CFEC rules, the Commission should commit to strong efforts and oversight to see that the rules are fully and effectively implemented. As noted above, major changes to adopted land use and transportation plans will be needed to redirect how and where metropolitan areas plan for growth and meet transportation needs. These changes will not be easy and will require continued oversight and leadership from the Commission and Department to redirect other urban planning work (especially for housing and economic development) and to work with other state agencies to realign the state's community development programs to help promote development in CFAs. This should, for example, include:

- Working with ODOT to redirect TGM grants and other state funded land use and transportation planning work to incorporate CFEC rules and implementation of CFAs into other planning projects.
- Working with ODOT and other agencies (and the Regional Community Solutions Teams) to prioritize state housing, economic development and infrastructure funding to support development in CFAs and other areas currently planned and zoned for walkable mixed use development.
- Committing to a regular evaluation of the CFEC rules every two years to assess whether or not they are achieving state goals for GHG and VMT reduction.

Proposed Action: Direct the Department to seek public review and comment on the [draft implementation work plan](#) and return in July or September with a revised CFEC implementation work program that outlines a full range of actions that the Department and Commission will take.

Oregonians rely on the land use planning program and this commission to provide effective leadership that enables Oregon communities to plan for a livable future. Reducing VMT is critical to meeting climate goals and will require major and immediate shifts in how our communities grow and how we plan for and invest in our transportation system. Slow, incremental changes that largely repeat what we've done for the last 10-20 years will put us further behind. Accordingly, the Commission needs to adopt strong, clear rules and commit to redirecting state planning and community development programs to achieve VMT reduction in the years ahead.

Sincerely,

Bob Cortright

Salem



1000 Friends of Oregon

@1000FriendsOfOregon · Nonprofit organ

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General

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Nonprofit Organization · Environmental Cor

1000 Friends of Oregon
March 23 at 2:51 PM

"Residents of sprawling cities like Oklahoma City or Dallas, Texas easily spend twice as much on driving than the average Oregonian.. Oregon cities don't sprawl to the same extent because of a 1970s law requiring urban growth boundaries, lines that limit where and how cities can expand."

Want to reduce climate change, create more walkable neighborhoods, and save money on gasoline? Read below for more information.

Right now, rules designed to create more climate friendly and equitable communities are being drafted at the state level by the Department of Land Conservation and Development.

We need your help to make sure these rules are strong, clear, and implemented with urgency, read and sign our letter here:

<https://bit.ly/3CvbTpJ>
<http://oregoncapitalchronicle.com/.../land-use-policy.../>



OREGONCAPITALCHRONICLE.COM

Land use policy, cautious investments could help Oregon weather economic uncertainty – Oregon Capital...

6



1000 Friends of Oregon @1000oregon · Mar 23

Want to reduce climate change, create more walkable neighborhoods, and save money on gasoline? Read below for more information.

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Right now, rules designed to create more climate friendly and equitable communities are being drafted at the state level by the Department of Land Conservation and Development.

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We need your help to make sure these rules are strong, clear, and implemented with urgency, read and sign this letter: bit.ly/3CvbTpJ

2 8



Bend Bikes

@BendBikes · Nonprofit org

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General

1,216 people like this

1,402 people follow this



Bend Bikes @BendBikes · Mar 16

State rules designed to make Bend an equitable and people-centered community with "complete" neighborhoods are in the works. Help ensure these rules meet the moment for people who walk, bike, and roll by signing onto this letter with us: bit.ly/3CvbTpJ!



1 1 3

bendbikes · Following

Right now, state rules designed to make Bend an equitable and people-centered community with "complete" neighborhoods are in the works by the Department of Land Conservation and Development.

This is a once-in-a-generation opportunity to increase affordable housing options and create more ways for people who walk, bike, roll, and take transit to get around.

We need to make sure these rules are strong, clear, and implemented with urgency.

Help ensure these rules are ambitious enough to meet the moment for people who walk, bike, and roll by signing onto this letter with us: bit.ly/3CvbTpJ **link in bio**

#climatefriendlyandequitablecommunities

1w

dirtdancedesigns Signed

1w 1 like Reply

View replies (1)

dseeley2 Signed! I love this

1w Reply

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Like Comment Share

Liked by scottrockshomes and 32 others MARCH 17

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Central Oregon LandWatch

@COLandWatch · ⭐ 4.3 (16 reviews) · Nonprofit organization

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About

2843 NW Lolo Drive, Ste 200 Bend, OR 97703

General

1,492 people like this

1,714 people follow this

Post details

Central Oregon LandWatch
March 14 · 🌐

"Today's biggest contributors to climate change are tied to our built environment. Where we live and work and how we travel determine our impact on this planet."

Some big things coming up this month, with chances to make some big changes for our future.



BENDBULLETIN.COM

Guest column: Central Oregon is ready for climate-friendly and equitable communities

Performance for your post

188 People Reached			146		
11 Likes, Comments & Shares					
11 Likes	11 On Post	0 On Shares	0 Comments	0 On Post	0 On Shares
0 Shares	0 On Post	0 On Shares	16 Post Clicks	0 Photo views	8 Link clicks
				8 Other clicks	
NEGATIVE FEEDBACK					
0 Hide post	0 On Post	0 On Shares	0 Report as spam	0 On Post	0 On Shares
				0 Unlike Page	

Reported stats may be delayed from what appears on posts

Central Oregon LandWatch @OregonLa
Climate change is here, and the time for!

24 hours left to sign on to this letter of support for Equitable Communities for Oregon.

[#ourclimatefriendlyfuturecantwait](#)

Sign the letter of support for #ClimateFriendlyAndEquitableCommunities:

docs.google.com
Letter of Support for Climate-Friendly & Equitable ...
To submit March 29, 2022 Land Conservation and Development Commission Department of Land ...



centraloregonlandwatch Bend, Oregon

centraloregonlandwatch We've got 24 hours to gather signatures and no more time to wait!

It's time for climate action now for Oregon.

Oregon is making some big moves to decide how our cities and towns grow and develop over the next 50 years.

- Will our cities be climate-friendly and equitable places to live?
- Will there be transportation options to navigate the city without needing to rely on a vehicle to get around?
- Will new housing meet the needs of those who truly need it?
- Will development focus on protecting our surrounding open spaces, water, and wildlife?

We have a huge opportunity to get things right for the future of Oregon's cities and towns.

But we need all the help we can get to support Oregon's Climate Friendly and Equitable Communities Rulemaking Process.

Sign on to our community letter of support at the link in our bio.

Edited · 1d

herbsinjars ❤️❤️❤️
1d · 1 like · Reply

556_liberty No thanks.

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👍 Liked by benoregon and 19 others

1 DAY AGO

centraloregonlandwatch Oregon

centraloregonlandwatch Our state's visionary land use policy can guide climate-friendly and equitable outcomes for our communities.

Rules designed to create Climate-Friendly and Equitable Communities are in the final stages of being drafted by the state. If these rules are strong and contain meaningful deadlines, they will create a more climate-resilient, healthy, and equitable future for Oregonians now and for generations to come.

Let rule-makers know these rules must be bold enough to meet the moment by adding your name to our coalition's letter of support for #ClimateFriendlyAndEquitableCommunities via the link in our bio.

tw

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👍 Liked by benoregon and 15 others

7 DAYS AGO

centraloregonlandwatch Oregon

centraloregonlandwatch Climate change is here, and the time for tangible action is now.

Right now, rules designed to create more #ClimateFriendlyAndEquitableCommunities are being drafted at the state level by the Department of Land Conservation and Development.

This is a once-in-a-generation opportunity to increase affordable housing options, create more car-free ways to get around, and achieve transformative outcomes for Oregon communities statewide.

But we need to make sure these rules are strong, clear, and implemented with urgency.

Help ensure these rules are ambitious enough to meet the moment by signing on to the letter to rule-makers.

Link in bio.

2w

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👍 Liked by deschutesriver and 35 others

MARCH 14

Add a comment...

centraloregonlandwatch Bend, Oregon

centraloregonlandwatch It's time to take meaningful action to respond to the #climatecrisis

We've got some big things coming up this month, with chances to make some big changes for our future.

"Today's biggest contributors to climate change are tied to our built environment. Where we live and work and how we travel determine our impact on this planet."

Read yesterday's guest column at the link in our bio.

P.S. Be sure and check your email inbox for an action alert this week on how we can get climate-friendly communities in action here in Central Oregon!

Edited · 2w

View Insights

👍 Liked by benoregon and 27 others

MARCH 14

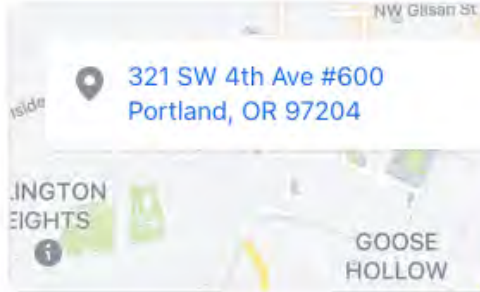
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Oregon League of Conservation Voters

@oregonlcv · Nonprofit organization

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General

7,600 people like this

8,160 people follow this



Conservation Voters @OLCV · Mar 25

Oregon's Land Conservation and Development Commission is currently going through a rulemaking process to create more bikeable and walkable communities around the state. You can help show your support by signing the petition today! [Learn more: olcv.org/help-create-bi...](#)



Comment, Share, Like (2), and Post icons



olcv · Following



olcv Oregon's Land Conservation and Development Commission is currently going through a rulemaking process to create more bikeable and walkable communities around the state. You can help show your support by signing the petition today!

[Learn more: https://www.olcv.org/help-create-bikeable-and-walkable-communities/](https://www.olcv.org/help-create-bikeable-and-walkable-communities/) (link in bio!)

#ORClimateAction

4d



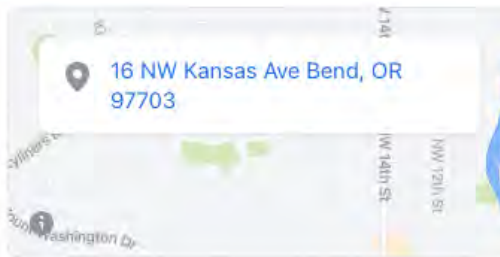
9 likes

4 DAYS AGO

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Post



General

2,810 people like this
3,583 people follow this



ACTION ALERT: Show your support for the Climate Friendly & ...
March 28, 2022 at 8:43 AM
ID: 4989174491120273

Interactions
1 reaction 0 comments 1 share

Overview Performance Paid results Feed preview

Performance

Reach		Engagements		Negative interactions	
Total	83	Reactions	1	Total	0
Organic	83 (100%)	Comments	0	Unique	0
Paid	0 (0%)	Shares	1		

envirocenterbend · Following

envirocenterbend Action alert: Please join us in urging Oregon's Land Conservation and Development Commission (LCDC) to fulfill their promise to "transform Oregon's communities to be safe, equitable, sociable, and pleasant places where driving is not required, and the amount of driving is reduced." The LCDC is now taking public comment on the Climate Friendly and Equitable Communities rules, which will impact how we live, work, travel, and play.

These new rules will ensure that Oregon's land use planning system meets the demands of the climate crisis. They will reduce the need to drive by making our communities more walkable, bikeable, and transit-friendly, while promoting more diverse and affordable housing options.

Take action today- the LCDC's final hearing is THIS WEEK!

Here are ways to show your support for this critical set of rules:

1. Sign the Letter of Support (link in bio) to tell the LCDC that you are in favor of rules that enable climate-friendly and equitable communities. Sign the letter by Tuesday, March 29, 2022.
2. Send an email to the LCDC: esther.johnson@dlcd.oregon.gov. Use the subject line: CFEC Comment for LCDC
3. Speak directly to the Commission by participating in the virtual LCDC meeting on Thursday, March 31, 2022
4. SHARE this post with your networks

#inbend #bendoregon #climateaction #climatechange #takeaction #sustainableliving #greencities #equity

1d
Liked by ben.jerrys.bend and 13 others
1 DAY AGO

Add a comment...

ACTION ALERT:
SUPPORT CLIMATE FRIENDLY & EQUITABLE COMMUNITIES IN OREGON TODAY

