Oregon
Tina Kotek, Governor

Department of Land Conservation and Development
635 Capitol Street NE, Suite 150
Salem, Oregon 97301-2540
Phone: 503-373-0050
Fax: 503-378-5518
www.oregon.gov/LCD

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To: Land Conservation and Development Commission

From: Brenda Ortigoza Bateman, Ph.D., Director
Matt Crall, Planning Services Division Manager
Cody Meyer, Land Use and Transportation Planner

Subject: **Agenda Item 8, December 4-5, 2025, LCDC Meeting**

Division 44 Metropolitan Greenhouse Gas Reduction Target Rules Review

I. Agenda Item Summary

As required in Oregon Administrative Rule (OAR) 660-044-0035, Department of Land Conservation and Development (DLCD or the department) staff have reviewed the pollution reduction targets in OAR chapter 660, division 44, Metropolitan Greenhouse Gas Reduction Targets in collaboration with Every Mile Counts state agency partners and with feedback from local government implementation partners. Staff will present findings from the review to the Land Conservation and Development Commission (LCDC or commission) to help the commission decide whether revisions are needed. This is an action item. Public comment will be accepted.

a. Purpose

Commission understands the Metropolitan Greenhouse Gas Reduction Target rules, the factors used to review the targets, and the review findings to inform a decision on whether or not to initiate a project to revise the targets.

b. Objective

Commissioners are knowledgeable about the background and process for the target rules review and decide whether to initiate rulemaking to revise the targets.

For further information about this report, please contact Cody Meyer, Land Use and Transportation Planner at 503-971-9475 or cody.meyer@dlcd.oregon.gov.

II. Background

House Bill 2001 adopted by the 2009 legislature and Senate Bill 1059 adopted by the 2010 legislature directed the commission to adopt targets for reducing greenhouse gas emissions from passenger vehicles in metropolitan areas. These targets guide cities, counties, and Metro as they conduct regional land use and transportation scenario planning. The commission

adopted the Metropolitan Greenhouse Gas Reduction Target Rules in OAR chapter 660, division 44 in 2011 and amended the rules in 2017 and 2022.

The targets are:

- set at a level needed to reduce greenhouse gas pollution 75 percent from 1990 levels by 2050 as required in Oregon Revised Statutes (ORS) 468A.205.
- set for each year from 2040 through 2050.
- for greenhouse gas pollution from travel by households in metropolitan areas.
- for greenhouse gas pollution from passenger cars and light trucks.
- based on expected improvements in vehicle technology, fuels, and state pricing.

The commission committed to reviewing the targets at four-year intervals to monitor progress on state actions and local implementation, and to decide if changes to the targets are needed. The commission last reviewed the targets as part of the Climate-Friendly and Equitable Communities rulemaking in 2021.

The process to adopt the initial targets and to review the targets included three other departments that collaborate within the Every Mile Counts cooperative program. These include the Oregon Department of Transportation (ODOT), Oregon Department of Environmental Quality (DEQ), and Oregon Department of Energy (ODOE). DLCD worked closely with these departments to review the targets.

a. Review Factors

OAR 660-044-0035 sets factors that the commissioners must consider as they decide whether to start a rulemaking process to revise the targets:

(a) Results of land use and transportation scenario planning conducted within metropolitan planning areas to reduce greenhouse gas emissions from light vehicles;

(b) New or revised federal and state laws or programs established to reduce greenhouse gas emissions from light vehicles;

(c) State plans or policies establishing or allocating greenhouse gas emissions reduction goals to specific sectors or subsectors;

(d) Policies and recommendations in the Statewide Transportation Strategy adopted by the Oregon Transportation Commission;

(e) Additional studies or analysis conducted by the Oregon Department of Transportation, the Department of Environmental Quality, the Oregon Department of Energy, or other agencies regarding greenhouse gas emissions from light vehicle travel, including but not limited to changes to vehicle technologies, fuels, and the vehicle fleet;

(f) Changes in population growth rates, metropolitan planning area boundaries, land use or development patterns in metropolitan planning areas that affect light vehicle travel;

(g) Efforts by local governments in metropolitan areas to reduce greenhouse gas emissions from all sources;

(h) Input from affected local and regional governments and metropolitan planning organizations;

(i) Land use feasibility and economic studies regarding land use densities; and

(j) State funding and support for scenario planning and public engagement.

These factors cover both state and local governments. Therefore, the target rules review includes information from the state and local levels.

b. State Actions

The rules allow cities, counties, and Metro to assume various state actions for vehicles, fuels, and pricing when they project regional progress towards meeting the targets. The target rules review report includes an update on progress of these state actions.

DLCD is part of Every Mile Counts, a cooperative program that includes ODOT, DEQ, and ODOE. These departments work together to implement the Oregon Statewide Transportation Strategy: A 2050 Vision For Greenhouse Gas Reduction. The four departments track progress, report results on the Oregon Transportation Emissions Website, and used that data as a part of this review.

The Statewide Transportation Strategy contains the assumptions on future state actions that were used to calculate the targets. The strategy identifies a pathway that would reduce greenhouse gas pollution from transportation to 60 percent below 1990 levels by 2050. This includes two types of reductions: reducing the amount of driving per person and reducing greenhouse gas emissions per mile traveled.

c. Local Actions

OAR 660-044-0035(3) directs the department to review the targets in consultation and collaboration with cities and counties in metropolitan areas, metropolitan planning organizations, and other departments of state government. Consultation with local governments covered the review factors listed in OAR 660-044-0035(2) with special focus on the local review factors:

(f) Changes in population growth rates

(g) Efforts by local governments to reduce greenhouse gas emissions

(h) Input from affected local and regional governments

(i) Land use feasibility and economic studies

(j) State funding and support for scenario planning and public engagement

DLCD staff used surveys and consultation meetings with local governments to gather input. The *2025 Metropolitan Greenhouse Gas Reduction Target Rules Review* report (Attachment A) includes a summary of how cities, counties, and Metro have implemented the targets through

the Climate-Friendly and Equitable Communities program. DLCD and ODOT have supported this work through financial and technical support. Three metropolitan areas have completed a regional scenario plan: Metro, Salem-Keizer, Eugene-Springfield. Five other areas are developing local performance measures and targets: Albany, Bend, Corvallis, Grants Pass, and Rogue Valley. These actions will identify a path to meet the greenhouse gas reduction targets in division 44. In addition, some cities and counties within these areas have completed required actions to reduce greenhouse gas pollution, such as designating climate-friendly areas. The report includes a summary of these local actions.

III. Target Rules Review Key Findings

Staff from the Every Mile Counts inter-department team reviewed the division 44 target rules to produce the *2025 Metropolitan Greenhouse Gas Reduction Target Rules Review* report included as Attachment A. Key findings from the target rules follow.

a. Results of land use and transportation scenario planning conducted within metropolitan planning areas to reduce greenhouse gas emissions from light vehicles

Cities and counties in three metropolitan areas have conducted scenario planning. Cities and counties in the other five metropolitan areas have used the greenhouse gas reduction targets in other planning projects. In every effort, local governments are able to find a path to achieve the targets with changes to local plans and policies and relying on state-led actions.

This factor does not indicate a need to revise the targets.

b. New or revised federal and state laws or programs established to reduce greenhouse gas emissions from light vehicles

The state has implemented several climate policies and programs over the last five years, including some that apply to transportation sector emissions. These programs will help reduce pollution. They do not establish transportation sector greenhouse gas reduction goals.

Since 2021, the federal government established several programs that made progress on reducing greenhouse gas pollution from light duty vehicles. More recently, federal laws and programs have changed to roll back requirements for reducing greenhouse gas pollution. There is significant uncertainty about how much further federal law will change and how this might affect the targets.

This factor could indicate a need to revise the targets.

c. State plans or policies establishing or allocating greenhouse gas emissions reduction goals to specific sectors or subsectors

There are no new policies allocating greenhouse gas emissions goals to the transportation sector since the commission reviewed the targets in 2021.

This factor does not indicate a need to revise the targets.

d. Policies and recommendations in the Statewide Transportation Strategy adopted by the Oregon Transportation Commission

The Oregon Transportation Commission (OTC) adopted the Statewide Transportation Strategy in 2018. As the OTC has not updated that strategy, Every Mile Counts and other departments of state government are focused on implementation. The strategy continues to effectively chart the course to greenhouse gas reduction goals, providing a balance of complimentary state and local actions.

This factor does not indicate a need to revise the targets.

e. Additional studies or analysis conducted by the Oregon Department of Transportation, the Department of Environmental Quality, the Oregon Department of Energy, or other agencies regarding greenhouse gas emissions from light vehicle travel, including but not limited to changes to vehicle technologies, fuels, and the vehicle fleet

Recent studies show that technology and changes in fleet are lowering average pollution per mile of driving, but along a path different from the path in the STS. Some studies show that vehicle fuel efficiency is not rising as fast as previously projected, partly because older vehicles are remaining in service longer. Other studies show that the pollution per gallon of gasoline has declined partly because the mix includes more ethanol. Overall emissions per mile are roughly 10% off the target in the STS.

This factor could indicate a need to revise the targets.

f. Changes in population growth rates, metropolitan planning area boundaries, land use or development patterns in metropolitan planning areas that affect light vehicle travel

Population growth rates and development patterns have not significantly changed since the commission amended the targets in 2017.

This factor does not indicate a need to revise the targets.

g. Efforts by local governments in metropolitan areas to reduce greenhouse gas emissions from all sources

At least 12 cities in metropolitan areas have a local climate action plan. The actions needed to meet the targets are consistent with local climate action plans and the requirements are complimentary to local climate action plans. Local climate action planning has not occurred to a level that would surpass the work required by the targets or make the targets redundant.

This factor does not indicate a need to revise the targets.

h. Input from affected local and regional governments and metropolitan planning organizations

As part of this evaluation process, DLCD staff surveyed local and regional governments. Respondents agreed with the need to address climate change and identified limited resources as the biggest barrier. A majority did not think that the targets needed to be updated. Participants who supported revising the targets differed on why the targets should change. Some people mentioned lack of progress on state actions, which would imply higher reduction targets for local actions. Others said that the targets are unattainable, which would imply lower targets.

Department staff also met with local and regional government representatives. None of these participants expressed a need for revising the targets.

This factor does not indicate a need to revise the targets.

Staff went beyond this factor to also meet with advocates who argue for revising the targets. They recommended raising the targets for cities and counties because state actions are off track.

i. Land use feasibility and economic studies regarding land use densities

The department funded market feasibility studies as part of local work to designate climate-friendly areas. These studies found that the land use densities needed to meet the targets are feasible. This is partly a result of new housing laws and rules over the last five years that removed barriers to infill, housing, denser housing, and mixed-use development.

This factor does not indicate a need to revise the targets.

j. State funding and support for scenario planning and public engagement

The state has invested significant resources over the last five years to support planning to reduce greenhouse gas pollution. While some of this funding will continue, other programs have ended.

- ODOT has identified approximately $7.5 million in funding to support required updates to transportation system plans for cities and counties in metropolitan areas.

- DLCD received and invested $3.5 million in one-time funding for cities and counties implementing the Climate-Friendly and Equitable Communities program from 2021-2025.
- With federal funds, ODOT provided one-time funding for scenario planning to cities and counties within the Eugene-Springfield area and the Salem-Keizer area, and performance measures and targets for the smaller 5 metropolitan areas. There is currently no available funding for scenario planning in other metropolitan areas at this time

This factor does not indicate a need to revise the targets.

IV. Considerations for Potential Rulemaking Process

The commission adopted the targets in OAR 660-044-0020 and 660-044-0025. Revisions would involve a major rulemaking process. Such a process would require significant investment of time by state and local government staff, as well as time on commission meeting agendas.

a. State Staff

Each of the departments involved in this review are facing reduced state budgets and working under federal uncertainty. This reduces the staffing that would be available to support rulemaking. ODOT is experiencing the greatest budget uncertainty. While the legislature enacted bills during a 2025 special session that increased revenues to ODOT to prevent massive staff reductions, this was not enough to restore vacant positions. Other departments are reducing their budgets in response to a decrease in state general fund revenue.

The transportation planning staff at DLCD currently has two vacant positions, a one-third reduction. While staff are still helping cities and counties update plans to reduce climate pollution, this is necessarily at a reduced level. A rulemaking process would further reduce the staff time available to provide technical assistance to help cities and counties meet the current targets.

b. Local Staff

A rulemaking process would warrant extensive participation by the cities and counties in metropolitan areas and by Metro regional government staff. Some local staff would likely be members of an ongoing rulemaking advisory committee. Others would participate in individual events such as webinars, community forums, focus groups, or surveys, and would feel the need to review and comment on draft rules. Local staff are already at or over capacity with local and state-driven work.

c. Commission

A rulemaking process would need a commissioner to serve as liaison to the rulemaking advisory committee. It would need time on the agenda for at least three commission meetings. This work is not included in the 2025-2027 Policy Agenda that the commission adopted in October.

V. Recommended Action

Overall, staff find that the factors do not indicate a significant need to revise the targets. A rulemaking project to revise the targets would take significant resources. Therefore, the department recommends that revisions to the targets are not warranted.

Recommended motion: “I move to find that revisions to the greenhouse gas reduction targets established in OAR 660-044 are not warranted at this time, as recommended by the department and explained in the staff report."

VI. Attachments

a. 2025 Metropolitan Greenhouse Gas Reduction Target Rules Review report

2025 Metropolitan Greenhouse Gas Reduction Target Rules Review

Department of Land Conservation and Development
November 2025

Acknowledgments

This report was developed as a part of the Every Mile Counts partnership. Every Mile Counts is a multi-agency partnership between Oregon Department of Transportation (ODOT), Department of Land Conservation and Development (DLCD), Department of Environmental Quality (DEQ), and Department of Energy (ODOE) to collaborate on actions to implement the Oregon Statewide Transportation Strategy: A 2050 Vision For Greenhouse Gas Reduction to reduce greenhouse gas emissions from transportation and bring Oregon closer to achieving the emission reduction goals.

A project team consisting of members from each agency was responsible for content and guidance on the development of this report.

Project Team

Cody Meyer - Department of Land Conservation and Development

Brian Hurley, Tara Weidner, Sylvan Hoover - Oregon Department of Transportation

Geoff Crook, Tori Leahy – Oregon Department of Energy

James Powell, Elizabeth Elbel, Rachel Sakata, Gerik Kransky - Department of Environmental Quality

Contents

Background

Oregon's Greenhouse Gas Reduction Goals

In 2007, the Oregon legislature passed House Bill 3543 which established three goals for reducing the state's greenhouse gas emissions:

- by 2010 to begin to reduce greenhouse gas emissions
- by 2020 to achieve GHG levels 10% below 1990 levels
- by 2050 to achieve GHG levels 75% below 1990 levels

Metropolitan Greenhouse Gas Reduction Target Rules

Legislative Background

House Bill 2001, adopted by the 2009 legislature, and Senate Bill 1059 adopted by the 2010 legislature, directed the Land Conservation and Development Commission (LCDC or commission) to adopt greenhouse gas emission reduction targets for cars and light trucks to guide the state's metropolitan areas as they conduct land use and transportation scenario planning. The legislation directed that targets identify the level of greenhouse gas reduction that each metropolitan area needs to achieve to help the state meet its 2050 goal of reducing emissions to 75% below 1990 levels. The development and adoption of target rules by LCDC in 2011 was guided by provisions of HB 2001 and SB1059. In brief, the two statutes require that the metropolitan emission reduction targets:

- Be consistent with achieving Oregon's greenhouse gas emissions reduction goals;
- Set for the year 2035;
- Must be for light vehicle travel;
- Considering differences in population growth rates;
- Consider expected improvements in vehicle technologies and fuels; and
- Be informed by information and recommendations from the Oregon Departments of Transportation (ODOT), Environmental Quality (DEQ), and Energy (ODOE).

2011 Rule Adoption

The commission adopted the Metropolitan Greenhouse Gas Reduction Targets (target rules) in OAR Chapter 660, Division 44. These rules establish greenhouse gas reduction targets, define methods for estimating greenhouse gas emissions, and establish requirements for scenario planning in May 2011. These targets were:

- For emissions for household travel (passenger cars, light trucks) in metropolitan areas;
- Set at level needed to help the state meet its 75% emission reduction goal from 1990 levels by 2050;
- For the year 2035 relative to a 2005 base year; and

- Integrated with expected reductions resulting from state actions in vehicle electrification, fuels, and pricing

Collectively, these attributes amount to greenhouse gas reduction targets that use the metric of household-based light duty vehicle miles travelled per capita relative to 2005. The targets allow regions to assume state-led actions in demonstrating progress to the targets. The targets highlight the authority of local governments, adjusts for data limitations (2005 rather than 1990 base year), and enable regions to integrate their planning with state-led planning for vehicle, fuel and pricing actions.

2017 Rule Amendments

In May of 2015, LCDC completed its review of the metropolitan greenhouse gas targets rules and directed the department to prepare amendments to the rules. The commission decision was based upon two key factors that indicated changes to the target rules were warranted – the state's metropolitan areas were updating long-range plans past the 2035 date of the targets, and two new metropolitan areas were designated that weren't included in the targets.

The commission adopted amendments to the target rules in January of 2017. These amendments:

- Replaced the 2035 targets with targets for 2040 through 2050;
- Set targets that apply equally for seven metropolitan areas;
- Set a higher target for Portland Metro;
- Redefined the greenhouse gas reduction targets from roadway to household travel; and
- Redefined the greenhouse gas reduction targets to rely on assumptions for future state-led actions as provided in the Statewide Transportation Strategy.

2022 Rule Amendments

In September of 2020, LCDC completed its review of the metropolitan greenhouse gas targets rules as a part of the scoping for the Climate-Friendly and Equitable Communities (CFEC) rulemaking. The commission directed the department to prepare amendments to division 44 as a part of the CFEC rulemaking.

The commission adopted amendments to the target rules in May of 2022. These amendments:

- Maintained the existing greenhouse gas reduction targets and future years;
- Required Eugene/Springfield and Salem/Keizer to develop a plan to meet the targets;
- Defined scenario plan contents; and
- Clarified rules for review and approval of scenario plans.

Target Rules Review

In developing and adopting the rules, the commission committed to reviewing the targets at four-year intervals to reflect new information and the results of various planning efforts to reduce greenhouse gas pollution. OAR 660-044-0035 sets the factors that the commission must consider

while reviewing the targets to decide whether to start a rulemaking process to revise the targets. Section 2 of the rule lists a series of factors for the commission to consider in its evaluation. The department is charged with preparing a report to assist the commission in conducting this review.

The review factors are:

a) Results of land use and transportation scenario planning conducted within metropolitan planning areas to reduce greenhouse gas emissions from light vehicles;
b) New or revised federal and state laws or programs established to reduce greenhouse gas emissions from light vehicles;
c) State plans or policies establishing or allocating greenhouse gas emissions reduction goals to specific sectors or subsectors;
d) Policies and recommendations in the Statewide Transportation Strategy adopted by the Oregon Transportation Commission;
e) Additional studies or analysis conducted by the Oregon Department of Transportation, the Department of Environmental Quality, the Oregon Department of Energy, or other agencies regarding greenhouse gas emissions from light vehicle travel, including but not limited to changes to vehicle technologies, fuels, and the vehicle fleet;
f) Changes in population growth rates, metropolitan planning area boundaries, land use or development patterns in metropolitan planning areas that affect light vehicle travel;
g) Efforts by local governments in metropolitan areas to reduce greenhouse gas emissions from all sources;
h) Input from affected local and regional governments and metropolitan planning organizations;
i) Land use feasibility and economic studies regarding land use densities; and
j) State funding and support for scenario planning and public engagement.

The target rules review includes information from the state and local levels because the greenhouse gas reduction targets incorporate both state and local actions.

State Actions

The rules allow cities, counties, and Metro to assume various state-led actions for vehicles, fuels, and pricing when they demonstrate progress towards meeting the targets. Part of the target rules review will be to monitor progress on these state actions.

DLCD is part of Every Mile Counts, a cooperative program that includes the Oregon Department of Transportation (ODOT), the Oregon Department of Environmental Quality (DEQ), and the Oregon Department of Energy (ODOE). These departments work together to implement the Oregon Statewide Transportation Strategy: A 2050 Vision For Greenhouse Gas Reduction. The four departments track progress and report results on the Oregon Transportation Emissions Website. The department will use this data in this review.

The Statewide Transportation Strategy contains the assumptions on state actions that were used to calculate the targets. The strategy identifies a pathway that would reduce greenhouse gas

pollution from transportation to 80 percent below 1990 levels by 2050. This includes two types of reductions: reducing the amount of driving per person and reducing the pollution per mile.

Local Actions

OAR 660-044-0035(3) directs the department to review the targets in consultation and collaboration with cities and counties in metropolitan areas, metropolitan planning organizations, and other departments of state government. In addition to the consultation with local governments, the following review factors in OAR 660-044-0035(2) are focused on local actions:

(a) Results of scenario planning
(f) Changes in population growth rates
(g) Efforts by local governments to reduce greenhouse gas emissions
(h) Input from affected local and regional governments
(i) Land use feasibility and economic studies
(j) State funding and support for scenario planning and public engagement

Target Rules Review Findings

This review of the metropolitan greenhouse gas reduction target rules finds that all eight metropolitan areas are actively planning to meet the metropolitan greenhouse gas reduction targets. The three regions that were required to produce a scenario plan to meet the target were able to do so, but all three needed to use the assumptions on state-led actions in the STS to meet the target.

Over the past five years, the state has made meaningful progress on meeting its climate goals. Governor Brown raised the overall greenhouse gas reduction goals through an executive order in 2020. The legislature has not enacted new laws or policy raising the goal. Neither branch has established any transportation specific targets. The Statewide Transportation Strategy is being implemented collaboratively by state agencies and local partners. The state is making progress on implementing the strategy, though key actions like pricing for environmental and social costs and per-mile pricing remain incomplete. More work is needed to overcome state implementation challenges and federal policy headwinds.

Population growth and development patterns remain stable and the land use densities needed to meet targets are considered feasible, thanks to recent state policy changes that support infill and higher-density development. Local climate action planning remains limited, and many local governments lack the resources to do more without additional state funding. Oregon has invested significantly in supporting local governments with amending plans to meet the targets, with funding secured through 2029. Continued progress will depend on state resources to support this work.

The following are the key findings from the review factors included in this review:

a) Cities and counties in three metropolitan areas have conducted scenario planning. Cities and counties in the other five metropolitan areas have used the greenhouse gas reduction targets to set performance measures. In every effort, local governments are able to identify a path to achieve the targets with changes to plans and policies and relying on state-led actions.

b) The state has implemented several climate policies and programs over the last five years, including ones that apply to transportation sector emissions. There are no new transportation sector greenhouse gas reduction goals. Even with fluctuating federal policy, the state has still made significant progress.

c) The state has raised the overall greenhouse gas reduction goals through an executive order but not made any statutory changes. There are no new policies allocating greenhouse gas emissions goals to the transportation sector since the targets were originally adopted in 2011.

d) The Statewide Transportation Strategy continues to effectively chart the state's course to reduce greenhouse gas from transportation since it was originally completed in 2013 and adopted by the Oregon Transportation Commission in 2018. The strategy provides a balance of complementary state and local actions. State agencies continue to collaborate on implementation and monitoring the strategy.

e) Until recently the state was on a path to achieve its multi-sector greenhouse gas reduction goal. Recent changes to federal policies have jeopardized that progress. The state was close to achieving the Statewide Transportation Strategy (STS) transportation greenhouse gas reduction goal. While key state-led actions in the STS have progressed at various states of implementation, more work remains on significant state-led actions such as per mile pricing, environmental and social costs, mileage-based insurance, and tolling in the Portland metropolitan area.

f) Population growth rates and development patterns have not changed much since the targets were last amended in 2017.

g) At least 15 of Oregon's 241 cities have a local climate action plan. The target rules cover 48 cities. The actions needed to meet the targets are consistent with local climate action planning and the requirements are complimentary to local climate action planning.

h) Affected local and regional governments see the need to address climate change but have limited resources to conduct this work. State funding for planning and projects is essential.

i) The land use densities required to meet the targets are feasible and policy interventions by the state over the last five years have removed barriers to infill and denser development.

j) The state has invested a significant amount of money over the last five years to support planning to achieve the existing targets. The funding is obligated through 2029.

Review Factor A – Results of Scenario Planning

Results of land use and transportation scenario planning conducted within metropolitan planning areas to reduce greenhouse gas emissions from light vehicles

Background

The purpose of the greenhouse gas reduction targets is to guide local governments as they evaluate what combination of policies and programs would needed to meet the targets. This factor reflects lessons learned through the various scenario planning efforts.

Analysis

Since the target rules were first adopted in 2011, DLCD and ODOT have supported local and regional governments in planning efforts designed to help achieve the greenhouse gas reduction targets. In the last five years, Metro adopted the 2023 Regional Transportation Plan, further implementing and monitoring the Climate Smart Strategy, Eugene, Springfield, Coburg, and Lane County submitted the Central Lane Scenario Plan, which was approved by DLCD in 2025. Salem, Keizer, and Marion County developed and approved a preferred scenario and they will submit the plan to DLCD in late 2025. ODOT supported the smaller five metropolitan areas (Albany, Bend, Corvallis, Grants Pass, Medford) with setting performance measures and targets set at levels calibrated to meet the regional performance targets identified in the Statewide Transportation Strategy.

Table 1 below provides the levels of ambition across various policy levers in the three scenario plans and five greenhouse gas performance targets for all of the metropolitan areas. These efforts have all reached similar conclusions about the combination of regional and local policies that are needed to reach the greenhouse gas reduction targets: investments in transit, active transportation, parking management, and transportation options programs, and more development in walkable mixed-use areas. Each of the three scenario plans relied on future assumptions on state-led actions on vehicles, fuels, and pricing to achieve their target.

Findings

All eight metropolitan areas have engaged with planning to meet the greenhouse gas reduction targets. Current plans are moving in the right direction, but the state and local governments need to continue to support more work to update plans. Scenario plans and performance targets are a first step in the planning process, followed by updates to local plans and policies. Significant funding is needed to implement these local plans and policies to implement the scenario plans.

In every effort, local governments are able to identify a path to achieve the targets with changes to plans and policies. All the plans rely on state-led actions on vehicles, fuels, and pricing in order to meet the targets.

	Portland Metro Climate Smart Strategy	Eugene-Springfield Scenario Plan	Salem-Keizer Scenario Plan	Performance Targets for Small Metropolitan Areas
Transit Service % Increase Transit (bus equivalent) Annual Revenue Miles				
	92% (2010-2035)	187% (2020-2045)	176% (2021-2050)	4-5x (2015-2050, not in TPR)
Transit daily revenue hours		Transit (bus equivalent) revenue miles per capita		
	9,400 (2035)	17.7 (2045)	28.6 (2050)	25 (2050, not in TPR)
Compact Urban Growth UGB expansion from 2010-2035 (Percent relative to population growth)				
	14% (+12,000 acres)			UGB area expands at about 15% of the pop. growth rate
	5% acreage expansion			
Mixed Use Development Percent of households living in mixed use neighborhoods (based on population density and dwelling unit type)				
Base Year	26% (2010)	7% (2020)	11% (2021)	8-18% (2015)
Target Year	37% (2035)	13% (2045)	12% (2050)	30% (2050)
Increased Biking and Walking Share of shorter trips (<10 miles one way) that shift from drive alone travel to bike travel 2010/2035				
Base Year	9% (2010)	12% (2020)	4% (2021)	5-8% (2015)
Target Year	17% (2035)	21% (2045)	15% (2050)	30-40% (2050)
Transportation Options and Incentives Percent of workers participating in employer-based commuter programs				
Base Year	20% (2010)	25% (2020)	24% (2021)	0-5% (2015)
Target Year	30% (2035)	60% (2045)	51% (2050)	25-50% (2050)
Percent of households participating in travel options programs (individualized marketing)				
Base Year	*9% (2010)*	25% (2020)	1% (2021)	0-2% (2015)
Target Year	45% (2035)	60% (2045)	36% (2050)	20-80% (2050)
Parking Management Percent of workers that pay for workplace parking				
0-5% (2015)	13% (2010)	1% (2020)	8% (2021)	0-5% (2015)
Target Year	30% (2035)	6% (2045)	23% (2050)	15% (2050)
Percent of non-work trips that pay for parking				
Base Year	8% (2010)	0.4% (2020)	2% (2021)	0-5% (2015)
Target Year	30% (2035)	2% (2045)	4% (2050)	3% (2050)
Greenhouse Gas Reduction Target Household Vehicle miles traveled (VMT) per capita reduction				
2005 - Future	29% (2035)	26% (2045)	30% (2050)	30% (2050)

Table 1 – Scenario Plan Policies and Strategies

Note: Values are pulled from different scenario plan sources, so may not be fully comparable.

Review Factor B – New Laws or Programs

New or revised federal and state laws or programs established to reduce greenhouse gas emissions from light vehicles

Background

Since the rules were last updated in 2022, several climate policies and programs have been implemented at both the federal and state level. Notably, DEQ has adopted rules to implement the Climate Protection Program and the federal government passed legislation directing historic levels of investment to climate pollution reduction efforts. In 2025, Congress and the Trump administration have rescinded funds that had not yet been obligated; however, significant amounts of funding and work were done prior to those efforts.

Analysis

State Policies and Programs

The programs reviewed in this section work collaboratively to ease the transition to a low fossil fuel future regulated by a declining cap on greenhouse gas emissions from the Climate Protection Program. Actions to support the transition include vehicle electrification, alternative fuels, and pricing and funding of low carbon modes that increase transportation choice.

Climate Protection Program

The Environmental Quality Commission adopted the Climate Protection Program in 2024. The rules adopted in OAR chapter 340, division 273 include a declining and enforceable limit, or cap, on greenhouse gas emissions from the use of fossil fuels, including in the residential, commercial, industrial and transportation sectors. The cap is lowered over time reaching a 50% percent reduction by 2035 and 90% reduction in emissions by 2050 from a baseline of average 2017-2019 emissions. Each year, DEQ distributes a set number of free compliance instruments to regulated companies. The program gives regulated companies the option to bank compliance instruments if they emit less than what they were allowed, trade compliance instruments with other regulated companies, or earn additional credits by contributing funds to DEQ-approved entities through the Community Climate Investments program.

For every metric ton of greenhouse gas emissions, a company is responsible for, it must submit a compliance instrument or a Community Climate Investment credit to DEQ. The first compliance period started Jan. 1, 2025, and covers emissions through the end of 2027. During the first compliance period regulated companies can choose to use Community Climate Investment credits to meet up to 15% of their compliance. Community Climate Investment credits are then reinvested in projects that demonstrate greenhouse gas emissions reductions.

Advanced Clean Cars II and Advanced Clean Trucks

In 2022 Oregon adopted the Advanced Clean Cars (ACC) II rule to require vehicle manufacturers to produce and deliver for sale increasing percentages of new zero emission vehicles beginning with the 2026 model year. Oregon is one of several states that accept the California standards allowed under their Clean Air Act Waiver, first established in 1967. According to the rule, by 2035 all new passenger cars, SUVs, and light-duty pickup trucks sold in the state must either be battery electric or plug-in hybrid electric vehicles. In 2021 Oregon also adopted the Advanced Clean Trucks (ACT) rule, which requires medium- and heavy-duty vehicle manufacturers to sell an increasing number of zero emission vehicles, beginning with the 2025 model year.

Clean Fuels Program

The Clean Fuels Program is one of Oregon's successful statewide policies for addressing the state's contribution to global climate change from transportation. This program has made significant strides since 2016 in reducing greenhouse gas emissions from Oregon's transportation fuels, such as gasoline and diesel. The program has led to companies producing biofuels now making those fuels more cleanly and delivering them in greater volumes to Oregonians. That transition to biofuels and electric vehicles is reducing tailpipe pollution and improving public health in the state.

The program has adopted targets of a 10% reduction in the lifecycle carbon intensity of fuels in 2025, 20% by 2030, and 37% by 2035.

Oregon Clean Vehicle Rebate Program

In 2017, the legislature passed HB 2017 which, among many other transportation investments, establishes a program to provide rebates for purchases of electric vehicles (including plug-in hybrid electric vehicles) and other qualifying zero-emissions vehicles. This program was designed to encourage higher adoption of ZEVs, reducing air pollution and advancing progress toward the state's greenhouse gas reduction goals. The Oregon Clean Vehicle Rebate Program (OCVRP), administered by DEQ, provides cash rebates to Oregonians who purchase or lease new or used zero-emission vehicles. The program offers two rebate options: the Standard Rebate, available to all Oregon residents, businesses, nonprofits, and public agencies, and the Charge Ahead Rebate, targeted toward low- and moderate-income households and nonprofit service providers. Rebate amounts range from $2,500 for new vehicles under the Standard Rebate to up to $7,500 for qualifying new vehicles and $5,000 for used vehicles under the Charge Ahead Rebate.

The program helps overcome the higher upfront costs of electric vehicles, supporting Oregon's climate and equity goals by reducing transportation-related greenhouse gas emissions while improving air quality in overburdened communities. Since its launch in 2018, OCVRP has issued more than 39,000 rebates totaling over $118 million, with more than half of those funds going to low- and moderate-income applicants.

Regional Mobility Pricing Project and ODOT Toll Program

The proposed Regional Mobility Pricing Project would have implemented congestion pricing on large portions of the interstate system in the Portland metropolitan area. On March 11, 2024, Governor Kotek directed ODOT to stop work on the Regional Mobility Pricing Project. The Governor also directed ODOT to pause additional work to implement tolls on the I-205 Abernethy Bridge so that the legislature can further evaluate and provide clearer direction on tolling. The Washington State Department of Transportation will be responsible for tolling of a new interstate bridge. ODOT is working with the legislature as they identify sufficient and sustainable funding solutions to put Oregon's transportation system on a solid foundation.

In September 2025, the legislature adopted HB 3991, repealing the authorization for tolling that came from the 2017 transportation package HB 2017. With this direction, ODOT has stopped the Oregon Toll Program.

OReGO Program

Oregon has to date relied on a fuel tax at the gas pump to pay for the costs of the transportation system. However, as people buy more electric or fuel-efficient vehicles, it results in less revenue from the fuel tax. Through the OReGO pay-by-mile system, Oregonians pay for improvements to, and maintenance of the transportation system based on the miles they drive instead of gallons of fuel consumed. ODOT launched OReGO in 2015 as a voluntary program. In 2025 with HB 3991, the legislature mandated participation in OReGO for certain electric vehicles beginning in 2027 and for all electric and hybrid electric vehicles by 2032. The cost to drivers will be 2.3 cents per mile beginning in 2026. A pay-by-mile system ensures that Oregonians pay their fair share for using Oregon's roads, including electric vehicle drivers. People who drive farther will pay more; people who drive shorter distances will pay less.

Oregon Transportation Plan

The Oregon Transportation Plan (OTP) update was adopted by the Oregon Transportation Commission in 2023. The plan is the long-range transportation system plan for the state, establishing a vision and policy foundation to guide transportation system development and investment. The plan identifies three priority areas for aiding in agency decisions – safety, climate, and equity. Two of the key performance targets focused on climate are:

- Reduce passenger vehicle miles traveled per capita by 20%
- Transition to cleaner vehicles and fuels, reducing CO2e per mile by 77%

The OTP includes several policies designed to help decarbonize the transportation system. Key climate policies and strategies include:

Implement the Statewide Transportation Strategy (STS)- Transition to low and no emission vehicles and fuels, expand availability and use of low and no emission modes, full cost pricing of transportation, improve system operations and performance, and make land use efficient.

Reduce Vehicle Miles Traveled (VMT)- Reduce the per capita VMT for passenger vehicles, more efficient use of existing capacity across modes, and promoting healthy lifestyles. Prior to adding motor vehicle capacity, assess if needs can first be met by multimodal investments, through transportation option programs, with system management improvements, or context-appropriate pricing strategies. In urban areas, consider the impact on the quality of non-automotive transportation users with intersection changes.

Make every mile driven clean- Enable broad electrification of the transportation system, including micromobility, light vehicles, medium and heavy-duty vehicles, and rail. Support transition to low-carbon fuels for fleets and sectors that are slower to or cannot electrify.

Low carbon operations- Transition to low-carbon materials and fuels in project construction and maintenance. Implement energy efficiency measures and practices.

Stewardship of public resources- Create sufficient, reliable and sustainable revenue, including milage-based user fees and consideration of tolling to cover the costs of new roadways.

Federal Funding -Infrastructure Investment and Jobs Act Funding (IIJA) and Inflation Reduction Act (IRA)

In 2022, the US Congress passed HR 3684, know as the Infrastructure Investment and Jobs Act Funding (IIJA). The IIJA was a historic series of investments to address the climate crisis, making more than $369 billion available to supercharge America's clean energy transition. In total, Oregon received approximately $4.5 billion. This includes an additional $200 million in transit funding over 2022-2026 — a 35% increase. Below is a summary of some of the transportation related climate work that was funded through the IIJA.

National Electric Vehicle Infrastructure Program

Oregon's National Electric Vehicle Infrastructure (NEVI) program is a federally funded initiative, created through the Infrastructure Investment and Jobs Act, designed to expand the state's public EV fast-charging network along major highways. Administered by ODOT, the program aims to accelerate the adoption of electric vehicles by making public EV fast charging infrastructure more convenient, accessible, affordable, and reliable. Through NEVI, ODOT expects to receive $52 million to aid the private sector in building out and expanding Oregon's fast-charging network along eleven highways designated as "EV corridors" through the Federal Highway Administration's Alternative Fuel Corridor program.

In 2022, ODOT released the Oregon National Electric Vehicle Infrastructure Plan, outlining a five-year strategy for investing in over 50 charging stations – each with at least four high-powered, fast charging ports -- across eleven key transportation corridors.

To date, ODOT has awarded grants for three high-traffic corridors and anticipates soliciting proposals to develop charging stations on four more priority corridors. ODOT's NEVI funding for fiscal years 2022 – 2025 is fully obligated ($41.1 million), and available to construct charging

stations identified in plans. ODOT's FY 2026 State Plan was approved by FHWA in September, 2025 and ODOT anticipates being able to access the additional $11.1 million NEVI state funding in the current fiscal year.

Community Charging Rebates Program

ODOT's Community Charging Rebates program (CCR) opened in 2023, with over $7 million in state funding. In Fall 2025, the program will expand with over $10 million federal funding from U.S. EPA's Climate Pollution Reduction Grant program.

The CCR program is a statewide initiative aimed at expanding access to charging infrastructure in Oregon communities to encourage more widespread EV adoption. The program offers rebates to support the installation of qualified Level 1 and Level 2 chargers at strategic locations, including public parking areas, workplaces, and multi-family housing complexes. Since its inception in 2023, ODOT has funded the installation of 1,252 charging ports at 248 locations, with projects from the most recent round of funding still under construction.

ODOT's next round of the program (with over $10 million of funding) will be used for rebates to support Level 2 and DC fast charging stations within predominantly low -income and priority communities.

Electric Vehicle Charger Reliability and Accessibility Accelerator (EVC-RAA)

The Electric Vehicle Charger Reliability and Accessibility Accelerator is a federally funded program administered by ODOT to improve the reliability, accessibility, and performance of public EV charging infrastructure across the state. The program launched in 2024 with a $10 million grant from the Federal Highway Administration. The program addresses a major barrier to EV adoption – charger reliability – by prioritizing investments in reliability, accessibility by enhancing station capacity to include four charging ports, and expansion of DC fast charging ports at existing stations and new charging stations.

In 2024, ODOT awarded $3.2 million in Round 1 grants to private sector EV charging service providers. ODOT launched Round 2 of the program in September, 2025, with up to $5.8 million available for additional awards.

Charging and Fueling Infrastructure Program (CFI)

The US Department of Transportation's Charging and Fueling Infrastructure (CFI) competitive grant program is a $2.5 billion federal initiative aimed at expanding publicly accessible EV charging and alternative fueling infrastructure across the United States.

In 2024, ODOT succeeded in its joint application with California and Washington, winning $102 million in funding for the West Coast Truck Charging and Fueling Corridor Project. Oregon's $21.1 million portion of the award will support the construction of two medium- and heavy-duty EV charging stations and one hydrogen fueling station along the I-5 corridor.

In addition, in 2024, the City of Tualatin (and 16 neighboring Oregon cities) won the Tualatin and Neighbors Charging Up program CFI grant ($15 million) and the City of Albany won its CFI project grant ($1.8 million).

Carbon Reduction Program

Oregon's Carbon Reduction Program, administered by ODOT, is a federally funded formula program established under the Infrastructure Investment and Jobs Act. Oregon received $82 million in funding to support projects that reduce greenhouse gas emissions from the transportation sector. Funding is distributed across three geographic areas:

- Oregon's three largest urban areas: Portland, Eugene, and Salem ($28.5 million)
- Small Urban and Rural Areas ($24.1 million)
- Statewide Projects ($29.8 million)

In 2023, ODOT released its Carbon Reduction Strategy, which highlighted ongoing efforts to decarbonize transportation in Oregon and laid out a framework for allocating Carbon Reduction Program funding. Types of projects funded through the Carbon Reduction Program include:

- Procurement of zero emission transit vehicles
- Zero emission vehicles and charging infrastructure for ODOT's fleet
- Deployment of Level 2 and fast chargers in multiple communities across the state
- Zero emission equipment and charging for heavy-duty applications
- Active transportation and transit infrastructure improvements

Of the $53.9 million administered by ODOT, $34.7 million has been awarded to projects that support electric vehicles and EV charging infrastructure, representing 26 of 39 projects.

As of June 2025, 90 percent of Carbon Reduction Strategy funds have been assigned to projects.

Climate Pollution Reduction Implementation Grant

The U.S. Environmental Protection Agency (EPA) awarded the Oregon Department of Environmental Quality's Climate Equity and Resilience Through Action (CERTA) grant to fund specific measures for the reduction of greenhouse gases within five years from October of 2025-December of 2029. This grant funds 12 measures in three categories that are among the largest contributors to Oregon's GHG emissions: Waste and Materials, Transportation and Buildings.

Transportation specific funds include over $65 million and are anticipated to reduce 321,000 MTCO2e at grant completion. Funding will support the continuation and expansion of existing programs in Oregon including:

- $31 million for light duty electric vehicle rebates
- $10.9 million for light duty electric vehicle charging: Community Charging Rebates (administered by ODOT)
- $14.8 million for Medium and Heavy-Duty electric vehicle rebates

- $6 million Medium and Heavy-Duty electric vehicle grants
- $3 million Medium and Heavy-Duty vehicle charging infrastructure rebates

ODOT Active Transportation and Transit Funding

In 2021, the Oregon Transportation Commission approved $255 million of flexible federal funding to Public and Active Transportation Program. The investments enhanced the program to include a variety of sub-programs for public transportation services and capital projects, pedestrian and bicycle projects, Safe Routes to Schools, and Transportation Options programs. Additionally, the Statewide Transit Improvement Fund (STIF) established in HB 2017, has continued to provide dedicated funding for improving and expanding public transportation services across the state. STIF funding was increased for 2025-2027 in HB 3991, but will expire without further legislative action.

ODOT Great Streets Program

Great Streets is a predominantly federally funded program to create more complete streets while also improving outcomes for safety, equity, climate and more. The Great Streets program was first funded in 2022 and continued through 2024-2027 for a total of $50 million. In 2023, the Oregon Legislature added $1 million to the program. It was continued through 2027-2030 with funds increased to $70 million for those years.

Impacts of Federal Climate Rollbacks

There are several recent federal actions that, if fully implemented, threaten the ability of the state in meeting its climate goals. Several federal actions specifically target the transportation sector – which makes up nearly 35% of Oregon emissions. These actions include the U.S. Environmental Protection Agency's (EPA) proposal to rescind federal greenhouse gas regulation authority and federal vehicle emissions standards.

Congressional Actions (2025-2026)

In 2025, the United States Congress adopted House Resolution 1 (HR 1), House Joint Resolutions 87, 88, and 89. Among other things, these bills eliminate penalties for vehicle fuel efficiency standards and ends federal Clean Vehicle Credits.

Included is a reversal of the U.S. Environmental Protection Agency's waivers for California's Advanced Clean Cars II, Advanced Clean Trucks, and Heavy-Duty Low NOx Omnibus rules. Oregon's rules are tied to the California waiver, so the action directly impacts Oregon's ability to enforce these rules. Oregon is challenging this action alongside California and a coalition of other states. Among the impacts, Oregon expects a short-term slowdown in the pace of zero-emission vehicle (ZEV) adoption across the state. This will negatively impact progress towards our climate pollution reduction goals and will require additional investments and actions to maintain progress.

As a result of the significant legal uncertainty created by the use of the Congressional Review Act for something that has generally been considered not a rule, DEQ will not pursue enforcement actions against any vehicle manufacturer that fails to meet the early years' requirements for increasing ZEV sales percentages and emissions reductions. Until the courts resolve pending litigation over this issue Oregon faces a legal and regulatory gray area that harms the state's ZEV adoption rates.

Federal Corporate Average Fuel Economy Standards (CAFE)

The National Highway Traffic Safety Administration sets CAFE standards for passenger cars and for light trucks and separately sets fuel consumption standards for medium- and heavy-duty trucks and engines. Section 40006 of HR 1 eliminated civil penalties for noncompliance with the CAFE standards, effectively rendering them moot. While this action will not impact the current fleet of vehicles on Oregon's roads if it is sustained over time, it has the potential to drive up emissions from the tailpipes of cars and trucks. This will impact Oregon's mid and long-range emissions estimates from transportation.

Zero Emissions Vehicles Federal Tax Credits

HR 1 rolled back federal tax credits for the purchase of zero emissions vehicles. Oregon has its own successful (and wildly popular) zero-emission vehicle incentive program. DEQ continues to provide Clean Vehicle Rebates for the purchase of zero emissions vehicles, ensuring State incentives continue to remain available during federal uncertainty. And while Oregon is likely to see a temporary slowdown of ZEV sales due to federal efforts to undermine vehicle regulations and end federal tax credits, there are several trends that suggest that ZEV adoption will not stall entirely but will instead proceed at a more modest pace until regulatory certainty and stronger policy signals return.

Rescission of Climate Funds

HR1 retains authority but rescinds unobligated funds for nearly every major EPA program created or funded by the Inflation Reduction Act. The Climate Pollution Reduction Grant authority and obligated funds remain intact, however Greenhouse Gas Reduction Fund authority and funds were rescinded, impacting many programs including Solar for All.

In an inaugural executive order called "Unleashing American Energy," the President proclaimed it was the policy of the United States to "eliminate the 'electric vehicle mandate' and promote true consumer choice." Federal agencies were directed to immediately pause the disbursement of funds appropriated through the IRA and IIJA, "including but not limited to funds for electric vehicle charging stations made available through the National Electric Vehicle Infrastructure Formula Program and the Charging and Fueling Infrastructure Discretionary Grant Program." After joining a coalition of 15 other states to challenge the action, Oregon was successful in maintaining the funding award. Oregon's 2026 NEVI Plan was approved; funding is expected to be available for the state in October 2026.

Greenhouse Gas Endangerment Finding

EPA recently proposed rescinding the landmark 2009 Greenhouse Gas Endangerment Finding. The Endangerment Finding established EPA's authority to regulate greenhouse gas emissions under the Clean Air Act based on a thorough and science-based assessment of the impact of greenhouse gas emissions from vehicles. This finding is the basis for federal greenhouse gas regulations for light, medium, and heavy-duty vehicles. Oregon DEQ worked with multiple State agencies to file comments in opposition to this action and we will continue to collaborate with our partners to oppose this action.

Federal greenhouse gas emissions standards for vehicles provided a unified policy to build upon. Without the federal policy, Oregon will be left with its state-level policies and will need to do more in order to achieve the same reductions in emissions. Federal rules create consistency across markets and enable greater economies of scale, enabling the private sector to better plan for the long term, reduce costs, and deliver cleaner technologies to Oregon residents and businesses. Removing federal vehicle emissions standards and preventing the state from creating its own will make it more difficult to achieve the state’s emission reduction targets.

Findings

The state has implemented several climate policies and programs over the last five years through a combination of state and federal decisions and funding. Even considering federal rollbacks, the state has still made significant progress. The Climate Protection Program and Advanced Clean Cars are two cornerstone policies to achieving the STS Vision. A historic investment of climate pollution reduction funding has been obligated and is being implemented by the state and its partners.

While there is significant risk, there is too much uncertainty at this time to determine how changes in federal policies might impact the state’s climate goals long term.

Review Factor C – Revised State Climate Goals

State plans or policies establishing or allocating greenhouse gas emissions reduction goals to specific sectors or subsectors

Background

In 2007 the state legislature adopted HB 3543, setting the following greenhouse gas emissions reduction goals:

- By 2010, arrest the growth of Oregon's greenhouse gas emissions and begin to reduce greenhouse gas emissions.
- By 2020, achieve greenhouse gas levels that are 10 percent below 1990 levels.
- By 2050, achieve greenhouse gas levels that are at least 75 percent below 1990 levels.

The legislation and goals did not establish or allocate greenhouse gas emissions reduction goals to specific sectors.

In 2010, the legislature adopted SB 1059, directing ODOT to develop a Statewide Transportation Strategy (STS) to aid in achieving the greenhouse reduction goals in HB 3543. The legislation also directed LCDC to adopt greenhouse gas reduction targets for metropolitan areas (target rules) that reflect the reduction goals of the state in HB 3543. The STS and target rules established an allocation of greenhouse gas emissions reductions from the statewide goals to the transportation sector and light vehicles in metropolitan areas. The STS does not meet the legislatively directed greenhouse gas reduction goals. However, the STS continues to serve as a roadmap for greenhouse gas reduction in the transportation sector.

Analysis

Since 2010, no new plans or policies have been enacted by the state to establish or allocate greenhouse gas emission reduction goals to the transportation sector or metropolitan area travel. Governor Kate Brown issued Executive Order 20-04 in 2020 which calls for the State of Oregon to reduce greenhouse gas emissions at least 45 percent below 1990 emissions levels by 2035, and at least 80 percent below 1990 emissions levels by 2050. The executive order, nor the Oregon Climate Action Commission, did not allocate or establish any goals to sectors or subsectors.

Findings

Since the greenhouse gas reduction targets are based on the metropolitan share of greenhouse gas emission reductions allocated to the transportation sector through the STS, the updated greenhouse gas goals for the state overall would need to be first accounted for in the STS as a part of a larger state-wide effort. A review of the reduction targets and assumptions of the metropolitan share of future greenhouse gas emission rates should be done in conjunction with a review of the STS.

Review Factor D - Statewide Transportation Strategy

Policies and recommendations in the Statewide Transportation Strategy adopted by the Oregon Transportation Commission

Background

Developed in 2013, the Statewide Transportation Strategy: A 2050 Vision for Greenhouse Gas Reduction (STS), serves as the roadmap for reducing transportation sector greenhouse gas emissions in Oregon. The STS examined all components of the transportation system including ground passenger and commercial services transportation, freight movement, and air passenger travel. Within each of these travel markets, transportation and land use options were explored to find the most effective mix of options for reducing greenhouse gas emissions with the fewest negative impacts. The document contains a broad range of strategies and actions for reducing emissions that modeling and analysis have shown to have measurable greenhouse gas reduction results.

The Statewide Transportation Strategy includes six transportation categories to reduce growth in vehicle miles traveled and to clean up each vehicle mile. The strategy establishes an agreement on the balance of state and local actions needed to meet the goal. The STS includes over one hundred strategies for achieving the transportation-related greenhouse gas reduction goal.

Six Transportation Categories

1. Vehicle and Engine Technology Advancements
2. Fuel Technology Advancements
3. Enhanced System and Operations Performance
4. Transportation Options
5. Efficient Land Use
6. Pricing and Funding Mechanisms

Implementation Authority

State Actions: Clean up each vehicle mile through full cost pricing	**Local Actions:** Reduce growth in vehicle miles traveled	**Shared Actions:** Collaborative actions to manage roadways
• Vehicle/fuel regulations • Per mile pricing • Throughway tolling	• Land use • Bike/ped networks • Transit service, TDM • Local fees, fuel taxes • Car service, transit, fleets	• Manage road growth • Operational reliability improvements • Local road tolling

Analysis

The Statewide Transportation Strategy 2050 Vision includes strategies for ground passenger and commercial services transportation, freight movement, and air passenger travel. The ground passenger and commercial services sector have future trajectories for actions that impact light duty vehicle travel at the regional level. Table 2 below highlights key state and local trajectories for 2050 in the STS related to the metropolitan greenhouse gas reduction targets.

Strategy	STS Vision 2050
Mixed Use Neighborhoods	Over 30% of urban households live in compact mixed-use neighborhoods Expanding urban growth boundaries by no more than 15 percent the rate of population growth.
Roadway Lane-Miles per capita: Freeway & Arterials	Expand road capacity only strategically to match population growth and alleviate severe congestion
Freeway Operations: Incident Response, Ramp Metering	95% of freeway miles have ramp metering and incident management
Arterial Operations: Signal coordination, Access Management	85-95% of the arterial street systems have coordinated traffic signal systems and Access Management
Road Cost Recovery Fees	All external costs are included in vehicle use fees
Congestion Pricing in the Portland Region	Drivers pay a $0.20 per mile charge when driving in very congested conditions in Portland. (2005$)
Single Occupancy Vehicle (SOV) Trip Diversion to bicycling or similar active modes	30% to 40% of short distance SOV trips shift (less than 10 miles one way) to bicycling, electric micromobility, or similar modes
Transit Service Miles per capita (Bus-Equivalent Revenue Miles)	Transit service miles are 3.5x higher in Portland and 1.5-10x higher in other regions than 2012 levels
Workplace Transportation Demand Management	25-50% of employees in urban areas participate in a program
Household Transportation Demand Management	20-80% of households in urban areas are covered by a program
Parking Costs	Average parking price is about 3x higher than 2012 levels
Parking Coverage	15-50% of workers pay for parking
Cleaner Vehicles and Fuels	Approximately 95% of vehicles in Oregon are hybrid or electric Average fuel economy for vehicles in Oregon is approximately 60 MPG

Table 2: STS Strategies for Ground Passenger and Commercial Services

Local governments are allowed to utilize STS assumptions on future state-led actions that affect auto operating costs, including state-led pricing and energy policies when demonstrating progress towards their greenhouse gas reduction targets. These are in addition to state-led actions on vehicle and fuel technology advancements, including vehicle mix, vehicle fuel efficiency, fuel mix, and fuel carbon intensity. These future year assumptions are allowable under the existing

Target Rules even if these actions have not been implemented yet by the state. The status of these state-led actions is reviewed in Factor E below.

Statewide Transportation Strategy Progress

In 2023, ODOT created the Oregon Transportation Emissions website to track progress ODOT and partner agencies have made to implement the actions in the STS. The STS identifies a pathway that would reduce greenhouse gas pollution from the transportation sector to 60 percent below 1990 levels by 2050. This includes two types of reductions: reducing the amount of driving per person and reducing the pollution per mile. The monitoring has shown significant progress in cleaning up each vehicle mile, while reducing the growth in vehicle miles traveled continues to provide opportunities for improvement.

Reducing Growth in Vehicle Miles Traveled

Reducing the growth in vehicle miles traveled has the most opportunities for improvement. Current trends suggest that Oregonian's driving habits, while slightly decreasing since 1990, won't achieve the per capita reduction goal in 2050. The state must take action to more significantly reduce how far and how often people drive by supporting more use of active and non-driving transportation like biking, walking and rolling, and transit.

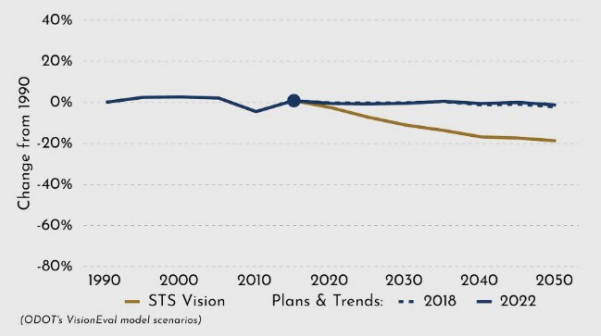

Figure 1 – Vehicle Miles Traveled per Person, Source ODOT

Cleaning up Each Vehicle Mile

Oregon has made significant progress in reducing the greenhouse gas emissions per vehicle mile traveled over the last few years. The challenge will be to ensure fuel and vehicle regulations passed in recent years are implemented successfully. State agencies will also need to work together to ensure the new vehicles using low emission fuels will have enough places to charge or fuel up.

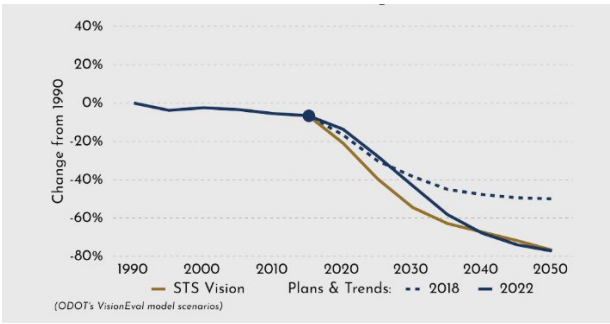

Figure 2 – Greenhouse Gas Emissions per Vehicle Mile, Source ODOT

STS Implementation - Every Mile Counts

Recognizing the need to better implement activities in the Statewide Transportation Strategy (STS), a group of state agencies created an inter-agency workgroup called Every Mile Counts in 2020. Every Mile Counts is a partnership between ODOT, DLCD, DEQ, and ODOE to collaborate on actions to implement the STS. The effort is a long-term commitment to collaborative climate action by these state agencies, guided by a memorandum of understanding.

The agencies agreed to dedicate the staff and resources needed for implementation actions and to develop two-year work plans. The work plans focus on objectives and priority actions that can benefit from collaborative relationships and programs already established among the agencies that support state and local emissions reduction goals.

Implementation Actions

The following are the actions completed and ongoing work identified through 2027.

2020-2022 Workplan

- Transportation Electrification Infrastructure Needs Analysis
- Climate Friendly and Equitable Communities Rulemaking
- Advanced Clean Trucks Rule

2022-2024 Workplan

- Commute Options Rulemaking
- Expand the Clean Fuels Program
- Interagency Zero Emission Vehicle Action Plan
- Zero Emission Vehicle Charging Infrastructure Deployment Strategy
- Medium and Heavy-Duty Electric Vehicles
- Climate Friendly and Equitable Communities Implementation
- Oregon Transportation Emissions Website

2025-2027 Workplan

Completed

- Climate Pollution Reduction Grant Transportation Implementation and Coordination
- Greenhouse Gas Quantification Handbook
- Metropolitan Greenhouse Gas Reduction Target Rules Review
- Oregon Energy Strategy

Ongoing

- Climate-Friendly and Equitable Communities Program Implementation
- Funding Handbook for Local Governments
- Oregon Transportation Emissions Website
- Voluntary Trip Reduction Update
- Medium and Heavy-Duty Electric Vehicle Charging Infrastructure Planning
- Zero Emission Vehicle Strategy for State

Findings

The Statewide Transportation Strategy continues to effectively chart the state's course to greenhouse gas reduction goals in the transportation sector since it was completed in 2013. The strategy provides a balance of complimentary state and local emissions reduction actions. State agencies have undertaken efforts to better implement the strategy and monitor progress.

Review Factor E – Climate Studies

Additional studies or analysis conducted by the Oregon Department of Transportation, the Department of Environmental Quality, the Oregon Department of Energy, or other agencies regarding greenhouse gas emissions from light vehicle travel, including but not limited to changes to vehicle technologies, fuels, and the vehicle fleet

Background

The metropolitan greenhouse gas reduction targets allow local governments to assume that state-led actions as included in the Statewide Transportation Strategy will be implemented by 2050. The purpose of this factor is to provide transparency on the state's efforts to reduce greenhouse gas emissions from the transportation sector. The Every Mile Counts partnership developed the Transportation Emissions website to track state actions and progress towards the STS 2050 Vision. The website will be updated as part of the 2027 STS Monitoring reporting.

Analysis

Studies

Oregon Climate Action Roadmap to 2030

In 2023, the Oregon Climate Action Commission produced the Oregon Climate Action Roadmap to 2030. The study included an assessment of how far the existing climate pollution reduction policies in the state go towards meeting the state’s greenhouse gas reduction goals. Included in the assessment are local policies consistent with the division 44 greenhouse gas targets. The analysis found that with continued implementation and funding of existing programs and policies as planned, Oregon is on track to meet the state’s multi-sector goal of at least 45 percent below 1990 levels by 2035. Land use planning policies were the most cost-efficient strategies of the 27 different policies studied. Policies that reduced demand for vehicular travel such as investments in transit, active transportation, and congestion pricing have a potential for more greenhouse gas reductions and are the second most cost-efficient of the policies studied.

2025 Update

In 2025, ODOE began updating the analysis for the Climate Action Roadmap to 2030 to reflect progress made through federal funding and the effects of federal rollbacks on fuel efficiency standards (CAFE). The updated analysis at the time of this report shows that as a result of increased electricity demand from data centers and rollbacks from the federal CAFE standards, the state is no longer on track to meet its 2050 climate goals. The analysis doesn’t include the federal reversal of the waivers that would affect the state’s Advanced Clean Cars rules due to the uncertainty with pending legal challenges.

Oregon Energy Strategy

In 2023 the legislature directed ODOE to develop the Oregon Energy Strategy, to identify pathways to achieve the state's energy goals, including greenhouse gas reduction targets. The Energy Strategy modeling found that transportation electrification and reducing vehicle miles traveled offer the greatest cost and energy savings, compared to strategies that rely more heavily on replacing fossil fuels with low-carbon fuels. The energy strategy modeling found that reducing per-capita vehicle miles traveled in light-duty vehicles represents a critical least-cost measure to reduce greenhouse gas emissions. Additionally, the analysis found that failing to achieve Oregon's VMT reduction targets proved to be the second costliest among all pathways analyzed.

Progress

Greenhouse Gas Emissions

Greenhouse gas emissions in the state have declined slightly in recent years. The transportation sector remains the largest single sector at 35% of all total emissions. Transportation sector emissions have trended down slightly since the targets were last amended.

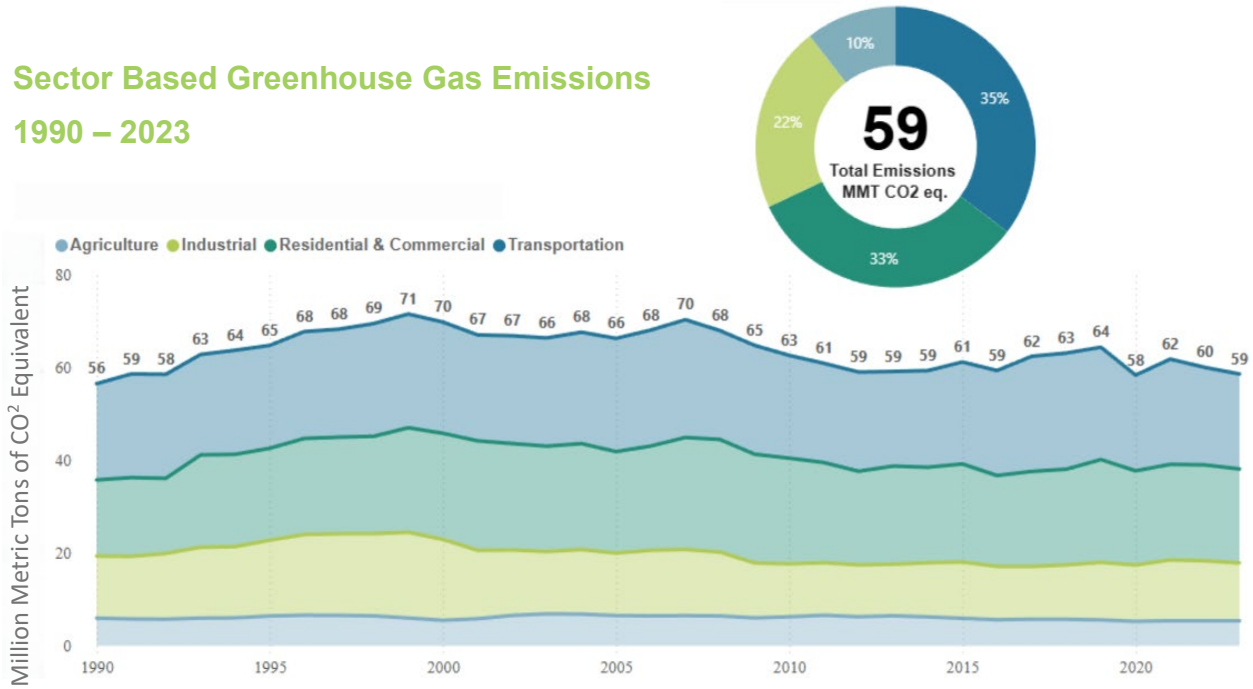

Figure 3 - Oregon Greenhouse Gas Emissions by Sector, Source DEQ

Within the transportation sector, gasoline for motor vehicles makes up the largest share of emissions. As noted below, gas sales have been declining over the last 5 years with more fuel-efficient passenger vehicles.

Vehicle Miles Traveled per Capita

Total vehicle miles traveled (VMT) has been trending upward over time due to population and employment growth in the state. More people generally means more travel. Per capita VMT has been trending downward due to travel choices at the personal level, suggesting people are taking shorter trips, fewer trips, and using active transportation.

Since 1990:

- Population has increased 51% (1990-2023)
- Total VMT has increased 35% (1990-2015) and 38% by 2023
- Per capita VMT has declined 6% (1990-2015) and 9% by 2023

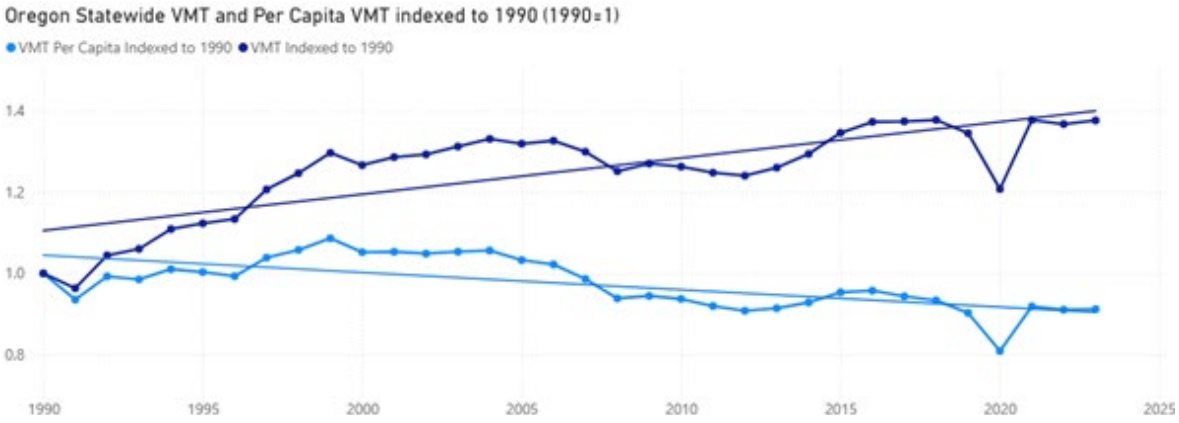

Figure 4 – Oregon VMT and per Capita VMT, Source ODOT

Current Trends Compared to STS

In 2022, ODOT updated the Statewide Transportation Strategy Monitoring Report and found that the state had not progressed along the emissions reduction pathway assumed to the 2050 STS Vision. The analysis found that while the state was off of the 2050 Vision path, as a result of the state's climate actions, plans were progressing along a new pathway, one that was much closer to meeting the 2050 greenhouse gas reduction goal than the previous monitoring in 2018. This new pathway is called 2022 Plans and Trends in the analysis and is comprised of the policies and programs in place in 2022.

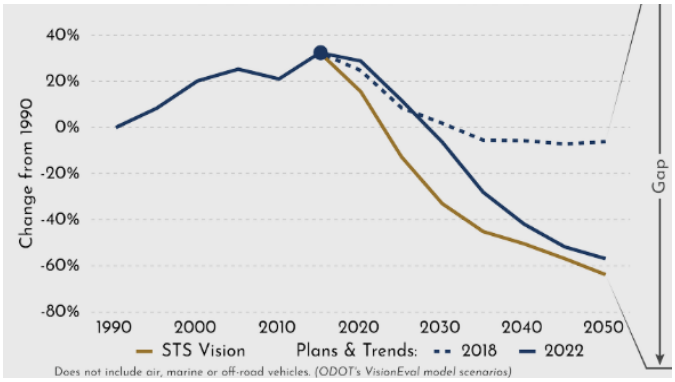

Figure 5 – Greenhouse Gas Emissions, Source ODOT

With respect to vehicle and fuel technology, the 2022 Plans and Trends path represents a different mix of policies than assumed in the STS Vision, one that would meet the STS Vision greenhouse gas per mile target by the year 2050.

For the purposes of this target rules review, progress towards achieving the STS is compared to the 2022 Plans and Trends path for vehicles and fuels (greenhouse gase per mile objective). This recognizes that technology has evolved differently than the STS, but still meets the STS Vision for how much technology would clean up each vehicle mile. For other actions, largely contributing to VMT per capita reductions,the STS Vision path remains the point of comparison.

Passenger Vehicles and Fuels

Greenhouse Gas per Mile Driven

A key state-led action assumed in the target rules is that the state will be able to accomplish the STS-levels of vehicle and fuel technology. These are reflected in a reduction in a greenhouse gas per mile metric (figure 6). This section summarizes trends in passenger vehicles and fuels– fuel efficiency, vehicle electrification, and energy carbon intensity. Trends show we are making progress in reducing passenger greenhouse gas emissions per mile, but more work is needed and federal rollbacks pose headwinds to the state's progress.

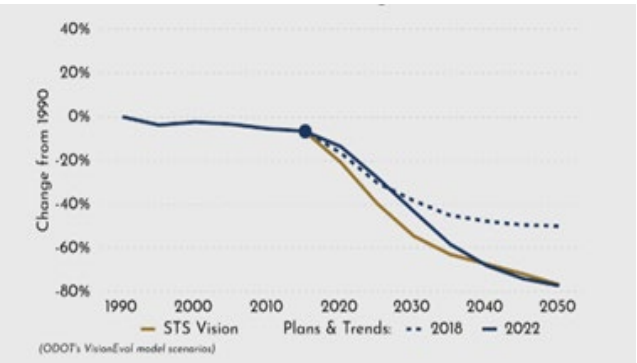

Figure 6 – Greenhouse Gas Emissions per Vehicle Mile, Source ODOT

Tailpipe emissions per mile were calculated based on ODOT reported fuel sales and vehicle miles traveled[1]. The analysis shows that greenhouse gas emissions per mile have dropped about 10% since 2008, with gasoline powered passenger vehicles reducing more than all vehicles. This reflects the implementation of state and federal actions that have led to more fuel-efficient passenger vehicles. However, more work is needed, as the trends fall short of the 2022 Plans and

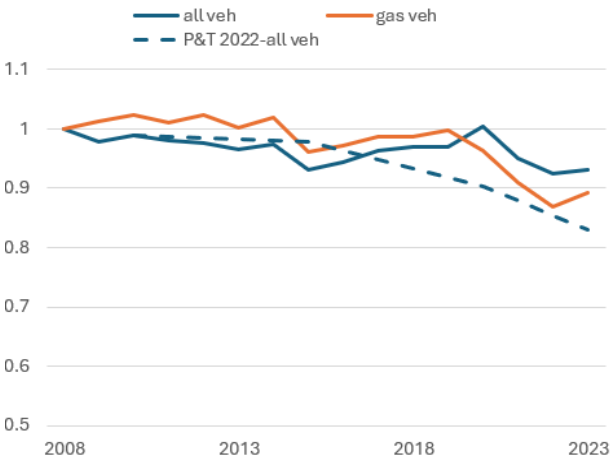

Figure 7 – Index of Observed Greenhouse Gas Emissions per Mile, Source ODOT

[1]ODOT Federal reported gallons and HPMS VMT. Does not include GHG from electric vehicles.
Gas metric assumes gas gallons and miles by all passenger vehicles (gas and other fuels). STS Modeling lines differ for several reasons including inclusion of upstream/electricity greenhouse gas emissions

Trends path to reach our 2050 goals (figure 7, dashed blue line).

Fuel Efficiency

Vehicle fuel efficiency is affected by the combined effect of vehicle electrification and related vehicle characteristics such as vehicle size and vehicle age. As first reported in the 2018 STS Monitoring report, the average Oregon vehicle age and size have been increasing, which works against meeting our climate goals. In the 2018 monitoring, a faster electric vehicle adoption rate was offsetting increased vehicle size and age, keeping the state on track at an overall fuel efficiency (MPGe) level. However, that is no longer the case, and Oregon is falling behind.

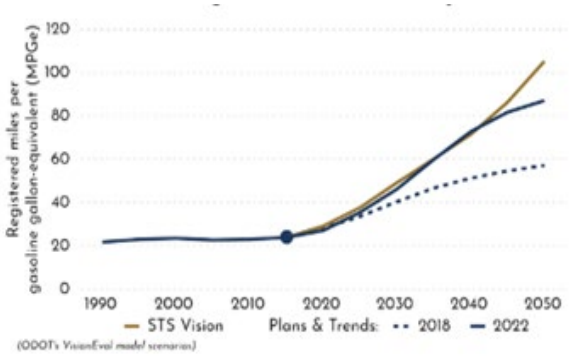

Figure 8 – Passenger Vehicle Efficiency, Source ODOT

In 2025 Oregon registered passenger vehicles had an average of 25 MPGe, a steady decline over the past couple decades. This is short of the planned 32 MPGe expected at this point in the 2022 Plans & Trends path. Some contributing factors are:

- Fuel efficiency of new light duty internal combustion engine vehicles in Oregon (figure 8) has improved significantly over time. This is due to a number of factors from technological advancements, consumer demand, and federal CAFE standards. This is important as most passenger vehicle sales will remain internal combustion engines for some time.
- Oregon gasoline sales peaked in 2019 (figure 10). Higher fuel efficiency means that less gas is needed as overall miles increase with a growing population.
- Consumers are buying larger vehicles, light trucks and SUVs in the US and Oregon.
- Average age of Oregon passenger vehicles is 13-14 years, at least 3 yrs older than expected.
- Rideshare and car service vehicles in the Portland area have a much higher fuel efficiency than individually owned and operated vehicles. The for-hire fleet had an average vehicle age of only 5 years and significantly larger proportion of gas-hybrid vehicles, in particular.
- Shift from internal combustion engines to hybrid and electric vehicles (as outlined below) has been dampened by these market trends.

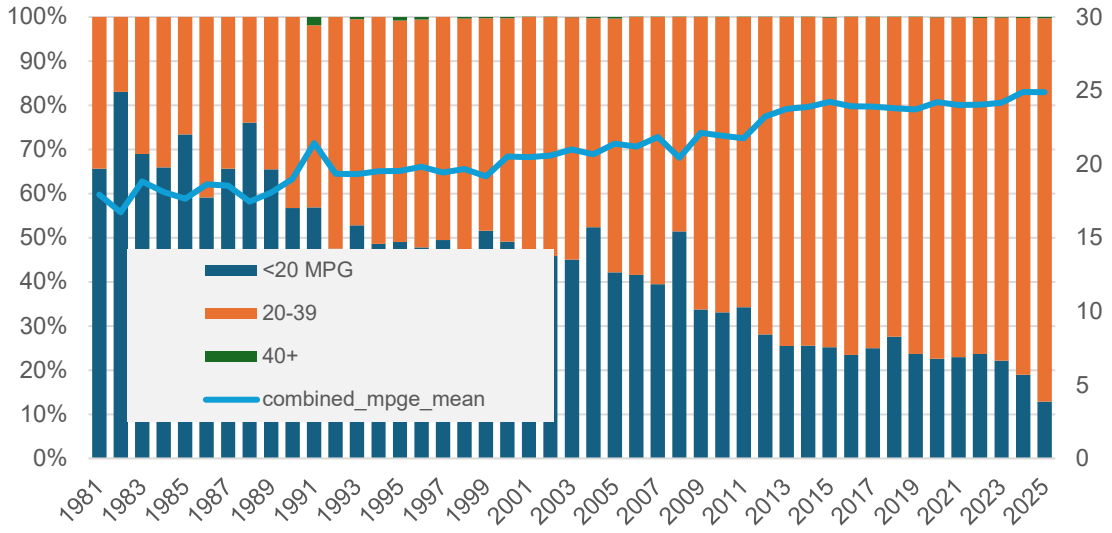

Figure 9 – Fuel Efficiency for Internal Combustion Vehicles by Model Year, Source ODOT

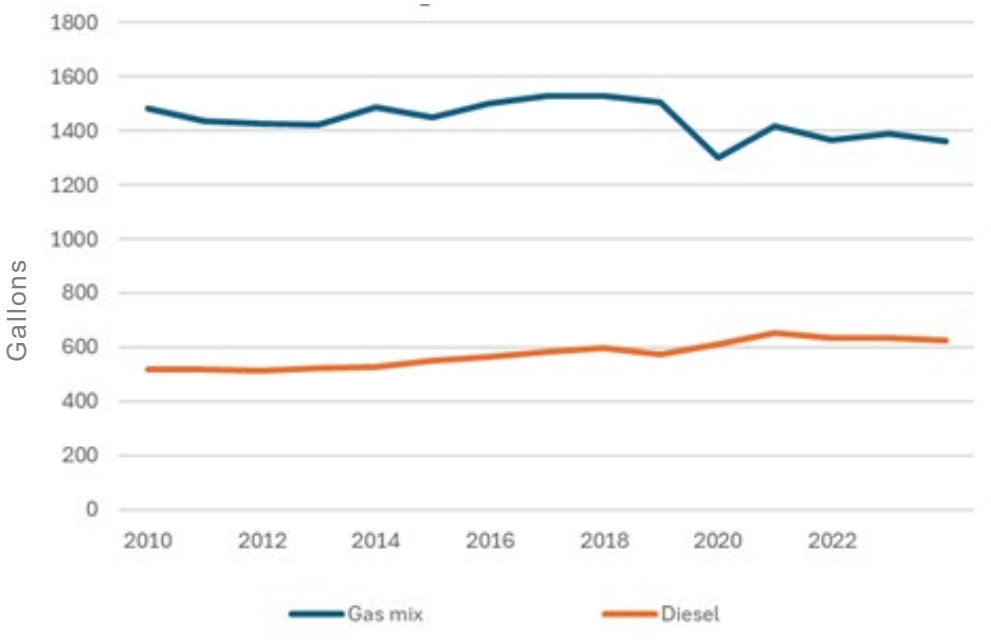

Figure 10- Oregon Reported Fuel Sales, Source ODOT

Vehicle Electrification

In 2025, 8% of Oregon's registered passenger vehicles have shifted to hybrid or electric vehicles. However, this is short of the anticipated 10% fleet share of hybrid and electric vehicles in the 2022 Plans and Trends path. This is a significant transition, a tripling since 2015. Oregon EV sales are the 6th highest in the country and well exceeding national trends. Federal actions are impediments to future progress and sales have plateaued in the last year. Despite the large gains, the state is off track in meeting its vehicle electrification goals.

Trends and contributing factors include:

- Oregon sales in 2025 are 13-16%, a tripling over the last five years (compared to roughly 10% US, 20% California).
- Battery range averages over 280 miles for new passenger vehicles in 2024, much longer than the 130-mile range expected in the STS at this point. This reduced range anxiety is helpful to EV sales.
- Public chargers are coming on-line rapidly, over 3,800 to date, a 2-3-fold increase since 2020. To date, this is about 60% of Level 2 and 30% of the DC Fast Chargers called out in the ODOT Transportation Electrification Needs Analysis. Over 600 additional public ports are expected in the next few years, supplementing private sector charging investments.
- Changes are underway to enable access across charging networks in the next few years.

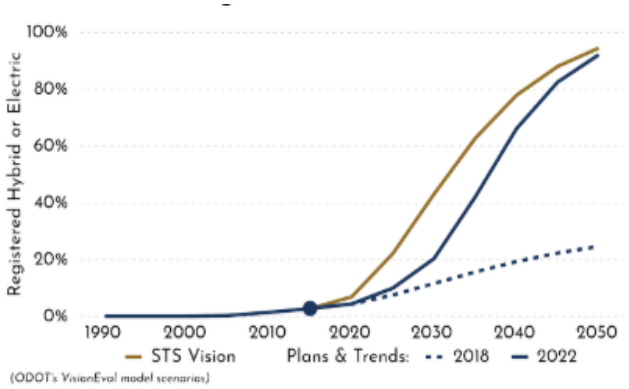

Figure 11 – Passenger Vehicle Powertrain, Source ODOT

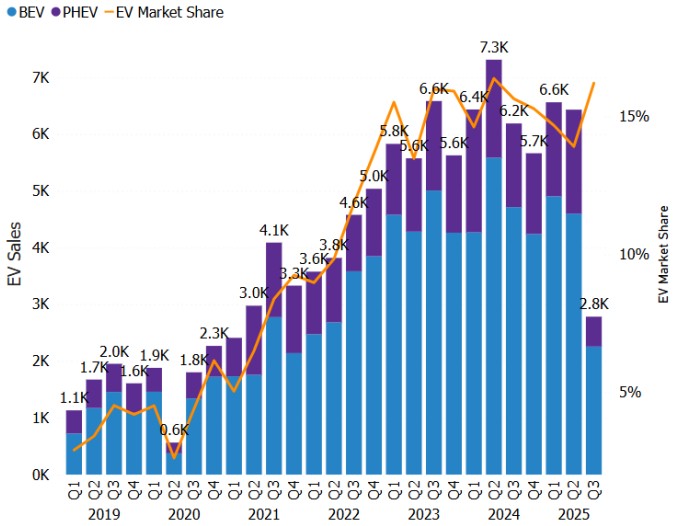

Figure 12 – EV Sales and Market Share, Source Atlas Public Policy EV Hub
*2025 Q3 data incomplete

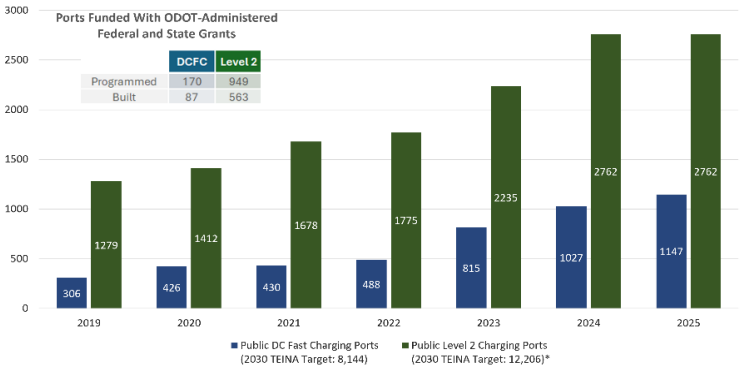

Figure 13 – EV Chargers, Source

Energy Carbon Intensity

Oregon's Clean Fuel Program has improved fuel carbon intensity by 10% since its inception in 2016, reducing greenhouse gas emissions by over 15 million tons of CO2e (figure 14). Gasoline sold in the state contains 11% Ethanol (E11), which may move higher if fuel suppliers and consumers accept gasoline with 15% ethanol content or E85, which contains between 50-80% ethanol. Biodiesel and Renewable Diesel supplies have increased, displacing up to a third of Oregon's fossil diesel in recent years, including significant use by public transit busses.

The carbon intensity of Oregon's electricity has declined over time (figure 15), despite year-to-year fluctuations largely driven by the amount of rainfall in the region and the resulting capacity to generate hydropower. The passage of HB 2021 in 2021, is expected to significantly reduce the carbon intensity form the state's two largest investor-owned utilities, which serve the majority of residents in the Portland area. It is unclear whether the required investments in renewable energy required by the bill will impact the carbon intensity of other utility providers across the state.

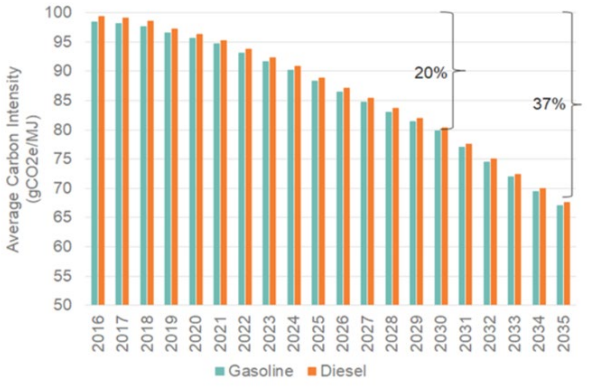

Figure 14 – Oregon Fuel Carbon Intensity, Source DEQ

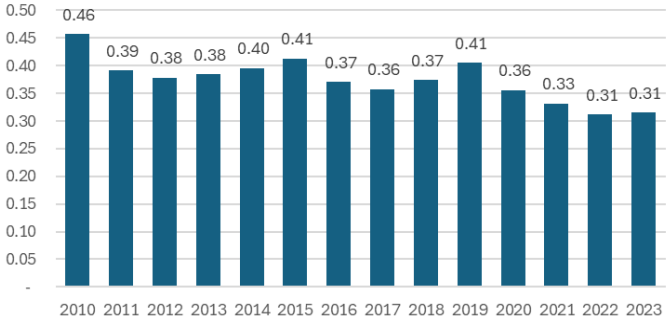

Figure 15 – Oregon Electric Carbon Intensity, Source DEQ

Pricing

How transportation is priced is an important part of the state-led actions that supports local governments in meeting the metropolitan greenhouse gas targets. Transportation fees need to keep pace with the costs to maintain, operate and build the system. Beyond funding the system, pricing provides a cost signal that affects the transportation choices Oregonians make. As discussed in factor (a), all of the scenario plans needed to rely on state-led pricing actions to reach their greenhouse gas targets. The STS assumes that approximately half of the reductions in vehicle miles traveled are attributed to pricing policies. The status of the STS state-led pricing programs - road cost recovery, tolling, pay-as-you-drive insurance, and capturing environmental and social costs - are summarized below.

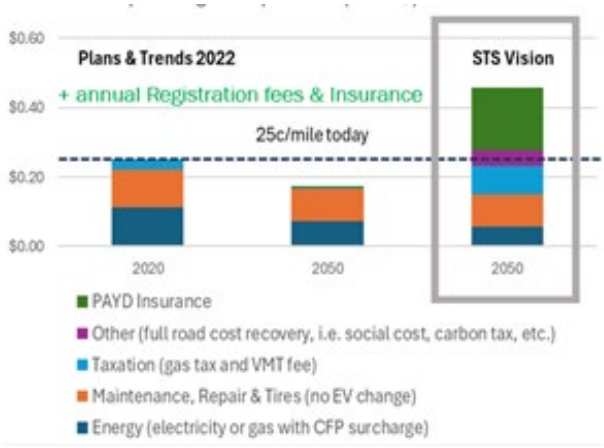

Figure 16 – Auto Operating Cost per Mile (2025 $), Source ODOT

Road Cost Recovery Fees

Road cost recovery pricing is comprised of gas-tax-equivalent fees including taxes, per mile fees, registration fees, and other additional fees that pay for the wear and tear on roadways. Shifting to "road use charging," asks drivers to pay for the miles they drive, not the fuel they use. It ensures all vehicles pay their fair share for using roads, including electric vehicle drivers. People who drive farther or more often will pay more. People who drive shorter distances or less often will pay less.

Oregon gas taxes were increased by the legislature several times since 2017 (HB 2017 and HB 3991). In January 2026 state gas taxes will be $0.046 per gallon on top of federal gas tax of $0.18 (federal tax has not changed since 1993). Additionally, some cities and counties have local gas taxes up to $0.10 per gallon. The STS assumes a shift to a road user charge (RUC) for all vehicles of $0.043 per mile in 2050 (2025 $), along with retaining a small gas tax.

In September 2025, the legislature adopted HB 3991 which includes a small gas tax increase of $0.06 per gallon and mandates a road user fee for electric vehicles of $0.023 cents per mile. These pricing actions go into effect in 2026. HB 3991 puts the state on the beginning stages of a path for all vehicles to shift from gas tax to a mileage-based fee needed to meet the STS Vision.

The HB 3991 mandates for a road-user charge for electric and hybrid vehicles by 2030 is an important milestone, but is short of implementing a sustainable funding mechanism for a multimodal transportation system. The STS level of per mile road cost recovery fees was

included in the "Full OTP Implementation (4X)" funding scenario in the 2023 Oregon Transportation Plan.

The state is off track in meeting the STS-levels of road cost recovery. Significant progress has made moving towards a road user charge, but fees have not kept up with the costs of inflation. More work is needed to meet per mile price signals at the level assumed in the STS by 2050.

Congestion Pricing

Congestion pricing and tolling are types of pricing actions that can help reduce traffic congestion by shifting some trips to nondriving means, alternative destinations, or to other times of day. They also help to manage transportation demand. Tolling and congestion pricing works best on bridges and heavily congested roads. The STS assumes the state will implement congestion pricing on most freeways during very congested hours in the Portland metropolitan area. While tolls are included in the Interstate Bridge Replacement project across the Columbia River, in 2024, Governor Kotek directed ODOT to stop work on the Regional Mobility Pricing Project and tolls on the I-205 Abernethy Bridge.

Despite work in this area, the state is off track in meeting the Portland area congestion pricing assumed by the STS. Congestion pricing is a key policy needed for the state to meet its climate goals and specifically for the Portland metro area to meet their greenhouse gas reduction target.

Pay as you Drive Insurance

Pay as you drive insurance programs charge insured drivers based on the miles they drive instead of paying an annual insurance premium. If you drive less, your rates are lower, which encourages people to drive less to save money. Which in turn translates into less greenhouse gas emissions and less time on the road, reducing the chance of crashes and injuries.

The STS assumes the state will change how vehicle insurance is paid in the state, shifting from a flat fee to a pay as you drive program for most Oregonians by 2050. Mileage-based insurance, without increasing overall costs, shifts the price signal so drivers are charged the full cost of driving with each mile. In 2025 less than 5% of insured drivers statewide are enrolled in pay as you drive insurance. Future steps to increase participation could include public education and the state working with insurance companies to increase adoption through more attractive options, tax incentives, and legislative mandates.

The state is off track to meeting this goal. More work is needed by the state and partners to consider how to implement the shift to per mile insurance called for in the STS.

Environmental and Social Costs

Driving results in environmental and social cost for Oregonians. Emissions from vehicles pollute the air resulting in community health harms. The cost of air pollution includes higher health care costs and manifest in more wildfires, storms, damaging people and infrastructure. These kinds of indirect costs can be harder to see. State agencies can help reduce the harm and frequency of external costs of driving through pricing programs that encourage travel with lower social costs.

This approach is called “user pays true cost” and ensures that activities that result in negative impacts have more transparent costs because of these impacts.

The STS assumes that the state will reduce these harms through pricing programs that encourage travel modes with lower social costs. This approach ensures that activities that create pollution or cause congestion have more transparent costs because of their impacts to all Oregonians.

DEQ’s Clean Fuels and Climate Protection Program are market-based programs that incentivize the use of lower emission fuels. These programs are expected to accelerate Oregon’s transition to lower emission fuels. These programs involve credit purchases to keep within the regulated reduction on fossil fuels sold in the state. As a result, environmental and social costs are reflected in the retail price of fuels sold in the state.

Despite the progress towards pricing the environmental and social costs of vehicle emissions made by the state in recent years, the state is off track in meeting the levels called for in the STS.

System Operations

System Operations are strategies used to optimize the efficiency, reliability and safety of the transportation system. Managing road system growth and efficiency strategies such as intelligent transportation systems work together to reduce congestion and amounts of driving on the system.

Manage Road Growth

Oregon lane miles have increased at a slower rate than population growth. Both per capita VMT and lane miles have decreased since 2000. Since the completion of the Interstate system in the 1990s, Oregon infrastructure investment has focused on relatively smaller capacity projects targeted towards bottlenecks and reliability. Total lane miles increased 1.7% since 2000, most of this growth occurred on the local system to accommodate new development. State-owned lane miles growth accounts for jurisdictional transfers, changes in highway configuration and construction of new lane miles.

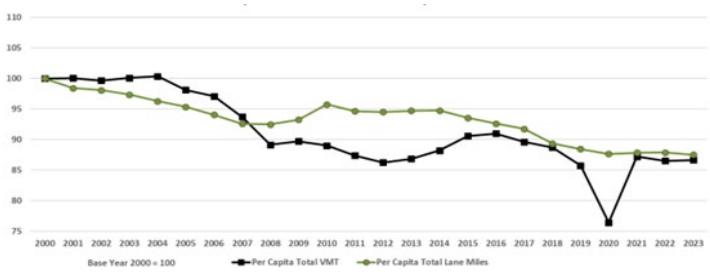

Figure 17 – Per Capita Statewide VMT and Per Capita Lane Mile, Source ODOT

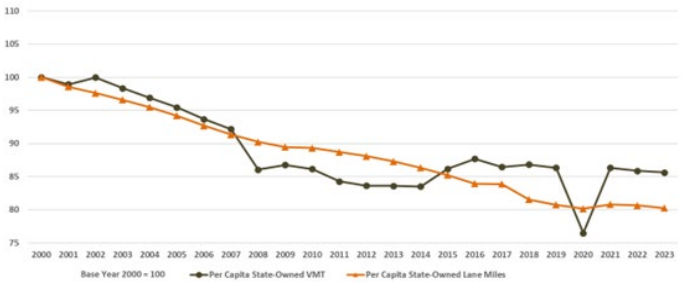

Figure 18 – Per Capita State System VMT and Per Capita State-Owned Lane Mile, Source ODOT

Since 2000:

- 106 lane miles added on interstates and freeways, including ramps and connectors
- 91 lane miles added on other roads and intersections

Of these 197 added lane miles:

- 109 miles are through lanes (general purpose lanes, through movement lanes, etc.)
- 88 miles are operational improvements (turn lanes, ramps, truck climbing lanes, etc.)

Updates to the Transportation Planning Rules and Oregon Transportation Plan have changed how the state and local governments evaluate road expansion projects. This includes a shift to reliability over congestion, setting performance standards beyond level of service, and requirements for review of roadway expanding projects in transportation systems plans.

The state is on track to meet the goal of managing statewide road expansion. The STS assumes that the state will "expand road capacity strategically to match population growth and alleviate severe congestion." To continue this trend, smart land use, efficiency and other demand management policies like tolling must be coupled with strategic road investments.

Intelligent Transportation Systems in Lieu of Road Capacity

State and local governments have been investing in Intelligent Transportation Systems (ITS) technology over the last decade to improve the efficiency of the transportation system without expanding capacity. The Oregon Transportation Plan includes policies for roadway expansion to occur only after pricing, options for shifting modes, use of demand management strategies, and operational improvements are explored and deemed to be insufficient. However, the larger than expected maintenance cost of implementing these programs either in labor (e.g. incident response) or technology (e.g. variable speed signs, variable message signs), has limited their expansion in more areas across the state.

The state is on track in deploying ITS operation programs at the levels called for in the STS, but is at risk of losing momentum and erode current ITS levels without more funding.

Findings

Since the Target Rules were adopted, the outlook for vehicle technology and fuel economy has put the STS within reach. Emissions per mile traveled are roughly 10% off 2025 targets but facing headwinds from current federal actions, drop off in electric vehicle purchases, consumer preferences for larger vehicles, and a slower turnover rate. State-led pricing has benefitted from Oregon's new mandated shift from gas tax to road user fees for EVs, but are not at the sustainable funding system at the levels assumed in the STS, and there is little progress towards shifting to pay as you drive insurance programs. Portland area congestion pricing has been paused. Road growth, particularly freeway lane-miles has been minimal, but several large capacity projects planned for construction no longer benefit from congestion pricing programs.

Collectively these trends show that while state actions are achievable and serious attempts at these actions have been made, the state is not moving fast enough to hit the STS targets. More work is needed, especially in the light of uncertainty of federal direction.

Review Factor F – Development Patterns

Changes in population growth rates, metropolitan planning area boundaries, land use or development patterns in metropolitan planning areas that affect light vehicle travel

Background

The greenhouse gas reduction targets are based in part on expected population growth and are set on a per capita basis, representing the reduction needed to meet the future year greenhouse gas reduction target. The targets were based on forecasts of state and metropolitan population growth available in 2017. Changes to metropolitan area boundaries and development patterns might affect growth of emissions in individual metropolitan areas or the ability of metropolitan areas to achieve emissions reduction.

Analysis

Changes to Metropolitan Planning Area Boundaries

The 2020 Census made minor changes to the Salem and Portland Metro urbanized areas. As a result, federal transportation regulations require the inclusion of the city of Aumsville as part of the Salem-Keizer Metropolitan Planning Area. The Portland Metropolitan Planning Area was expanded to include new areas defined by the census urbanized areas but did not include any new cities.

State Population Growth

Population growth in the state has slowed since the targets were originally adopted in 2011 and is expected to continue at a rate similar to the assumptions used in the amendments of the 2017 target rules (table 3). Population growth is expected to show a slow positive increase in the future reaching 4.5 million in the year 2035 with an average annual rate of growth of 0.4% between 2024 and 2035. In-migration will be responsible for Oregon's future population growth as fertility rates remain below replacement levels and the number of deaths continue to rise due to an aging population. Economic activity will heavily influence the state's population growth as people move to the state for job opportunities. The majority of jobs and employment opportunities are within the metropolitan areas of the state.

2010 - 2017	2017 - 2025	2025 - 2035
8%	3%	5%

Table 3 – Oregon Population Growth Rate, Source Oregon Office of Economic Analysis

Metropolitan Area Population Growth

Since the targets were last amended in 2017, population growth in the state and within metropolitan areas has slowed from past trends. Metropolitan area population grew by 3% between 2017 and 2024, compared to population growth of 9% between 2010 and 2017. Most of the population growth has occurred in the Portland Metro, Salem-Keizer, Bend, and Eugene-Springfield metropolitan areas.

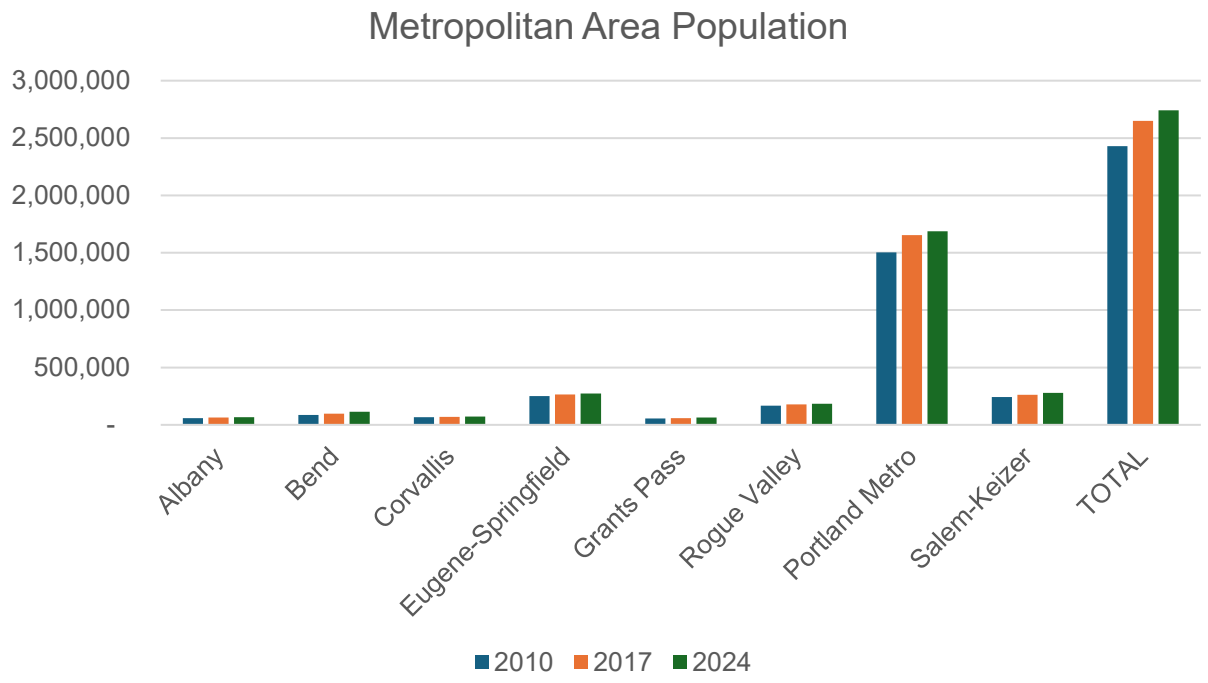

Figure 19 – Oregon Metropolitan Area Population, Source PSU Population Research Center

Development patterns

The Statewide Transportation Strategy (STS) includes a goal to encourage communities to accommodate most expected population growth within existing urban growth boundaries (UGB) through infill and redevelopment. The goal aims for the area within metropolitan area urban growth boundaries to expand at about 15% of the rate of metropolitan area population growth. Efficient land use reduces the demand for vehicle travel. Compact growth and development reduces the distances that people and goods must travel and provides more opportunities for people to use active modes of transportation.

In the 2018 STS Monitoring Report, DLCD found that on average, the area within metropolitan area urban growth boundaries have expanded at about 17% of the rate of metropolitan area population growth from 1990 to 2015.

A more recent analysis shows that on average, the areas within metropolitan area urban growth boundaries have expanded at about 13% of the rate of metropolitan area population growth over the thirty-five-year period from 1990 to 2025.

These findings demonstrate that Oregon is on track to meet the goal for accommodating expected population growth within urban growth boundaries.

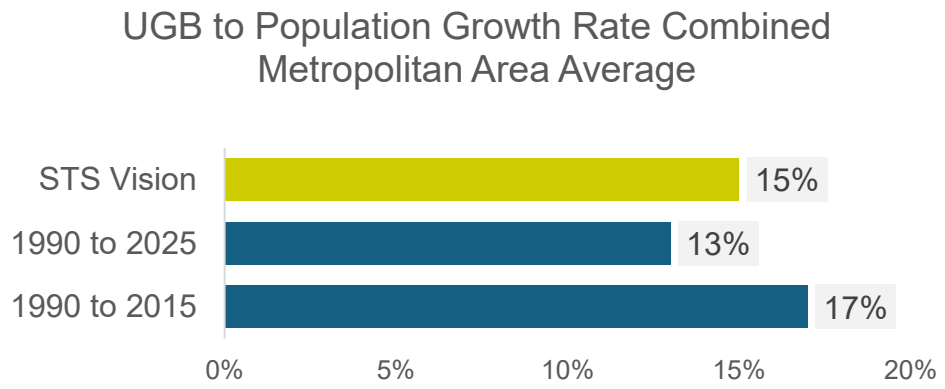

Figure 20 – UGB to Population Growth Rate, Source DLCD, PSU Population Research Center

Findings

Population growth rates and development patterns have not changed much since the targets were last amended. Minor changes to population growth rates and boundaries to metropolitan planning areas have occurred since the targets were last amended in 2017. Urban growth boundaries have expanded at an expected rate to accommodate population growth.

Review Factor G – Local Climate Action Planning

Efforts by local governments in metropolitan areas to reduce greenhouse gas emissions from all sources

Background

This factor responds to concerns when the rules were established, that the greenhouse gas reduction targets were overly prescriptive about reducing auto travel as a means to achieve greenhouse gas reduction. This factor asks that the commission evaluate whether other efforts by local governments are helping to achieve the state's overall goal to reduce greenhouse gas emissions.

Analysis

Many communities in Oregon are developing policies and plans to reduce their local greenhouse gas emissions, reduce environmental impacts of the built environment, transition to more sustainable energy sources, and improve resiliency to climate change. While these plans are independent of the metropolitan greenhouse gas reduction target requirements, they can provide insights into how jurisdictions are evaluating and adopting actions and policies that directly connect local policies and programs with climate impacts.

At least 15 Oregon cities have either adopted or are developing a local climate action plan, including:

- Albany
- Beaverton
- Bend
- Corvallis
- Eugene
- Gladstone
- Hood River
- Milwaukie
- Mosier
- Portland
- Rockaway Beach
- Salem
- Tualatin
- West Linn
- Hillsboro

Findings

Climate action planning is happening with a small set of cities but is not widely adopted. At least 15 of Oregon's 241 cities have a local climate action plan. The target rules cover 48 cities. The actions needed to meet the targets are consistent with local climate action planning and are complimentary to local climate action planning. Local climate action planning has not been implemented to a level that would surpass the work required by the targets or make the targets redundant.

Review Factor H – Local and Regional Input

Input from affected local and regional governments and metropolitan planning organizations

Background

Success in meeting the greenhouse gas reduction targets requires a combination of local, regional and state actions. The program requires local governments and the state to work in partnership, with a shared responsibility of monitoring how local and statewide actions and programs are progressing. This factor gathers input from affected local and regional governments to determine how the targets are working in practice.

Analysis

Input from Affected Local and Regional Governments

From August through October of 2025, DLCD surveyed affected local and regional governments from the state's metropolitan areas. Below are key themes and results from the 35 respondents to that survey.

Which of the following impacts of climate change are you most concerned about?

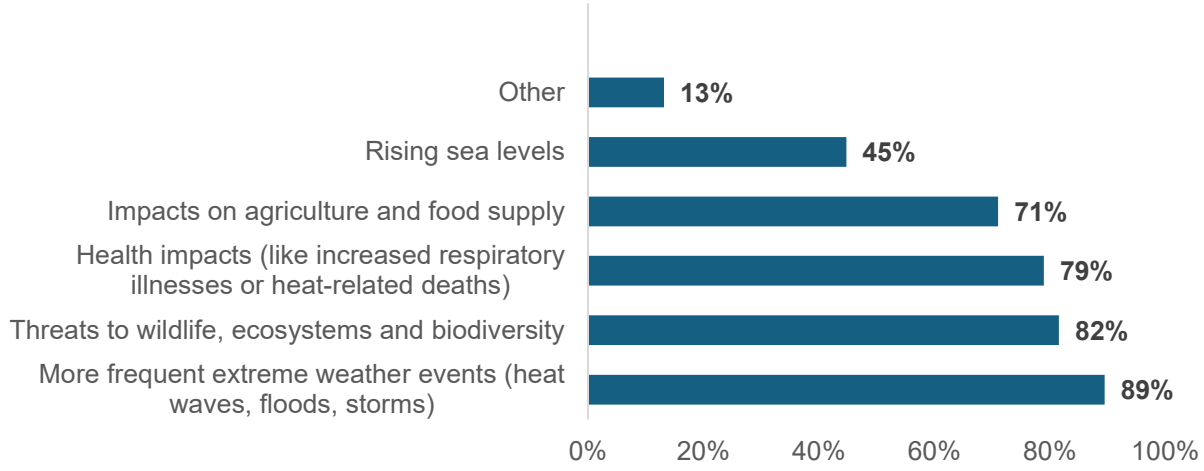

Figure 21 – Survey Responses of Climate Concerns, Source DLCD

How aware are you about the metropolitan greenhouse gas reduction targets adopted by the Land Conservation and Development Commission for Oregon's metropolitan areas?

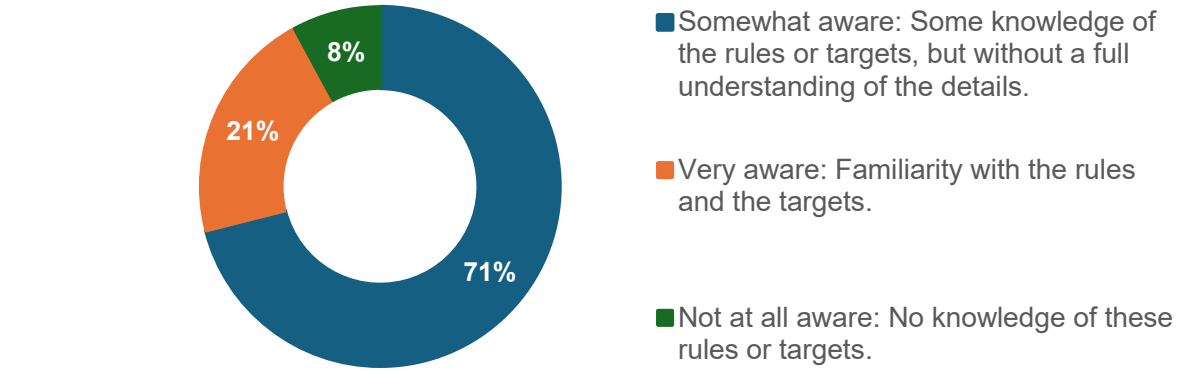

Figure 22 – Survey Responses of Target Rule Familiarity, Source DLCD

Please indicate any significant challenges or barriers to local climate mitigation efforts that you may have encountered.

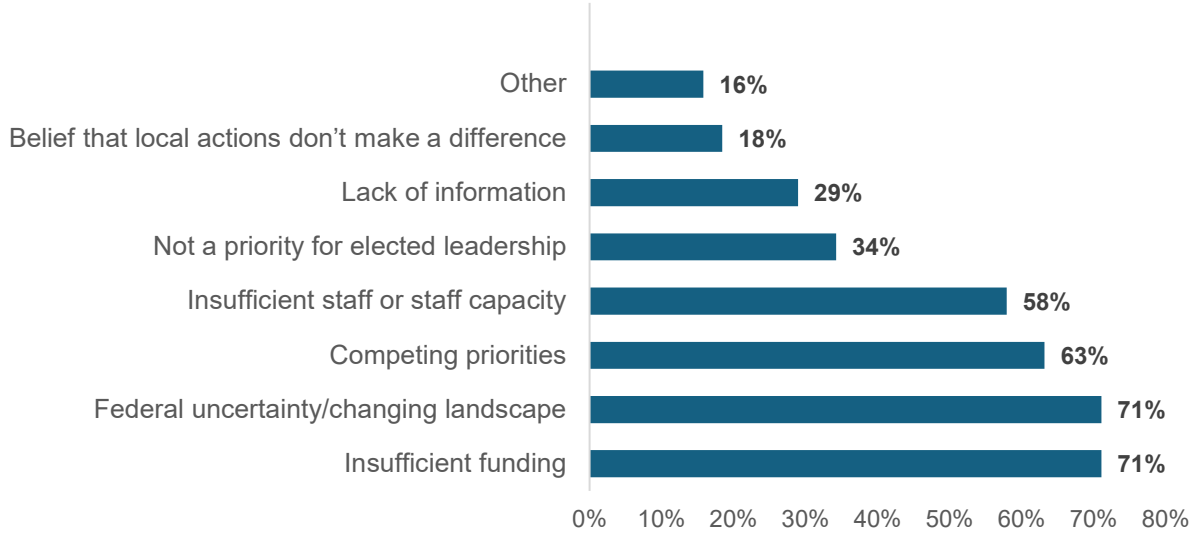

Figure 23 – Survey Responses of Barriers to Climate Work, Source DLCD

Describe any other challenges or barriers that you'd like to share.

Themes:

- Lack of funding for implementation of projects and programs
- Political pushback
- Need for more detailed information

Do you have any ideas about how the state might best address these challenges or barriers? What have you seen that is effective in your community?

Themes:

- Climate funding for local governments
- Education and outreach
- Analysis and tools provided by the state

What state or federal policies or actions do you think will be the most effective to help local governments and metropolitan areas reach their greenhouse gas reduction targets?

Themes:

- Transit
- Transitioning vehicle fleet to low/no carbon
- Congestion pricing
- Land use reform

For planning to achieve the greenhouse gas reduction targets, what assistance is most needed at a local level?

Funding, Modeling and Analysis, and Planning Assistance were the top three ranked needs of local governments to help plan for reducing greenhouse gas reduction targets.

Ranking	
1	Funding
2	Modeling and Analysis
3	Planning Assistance
4	Community Engagement
5	Assistance with Monitoring Progress
6	Presentations at Public Meetings

Do you think that updates to the metropolitan greenhouse gas reduction targets are needed at this time?

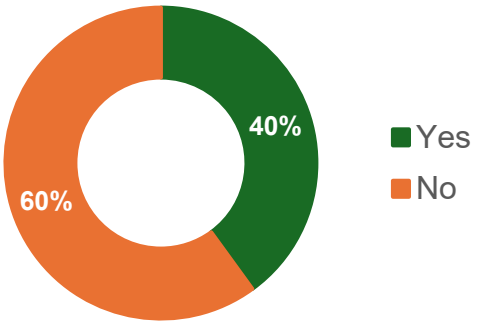

Figure 24 – Survey Responses of Need to Update Targets, Source DLCD

Please tell us why.

Yes

- Update to current information
- Adjust for lack of progress on state-led actions
- Targets are unattainable

No

- Implementation of current targets is still underway
- Focus on achieving goals rather than perfecting targets
- Targets seem to be reasonably set

Finally, considering whether or not revisions to the greenhouse gas reduction targets are needed, is there anything else we should consider or know?

Themes:

- More action less planning
- Focus on implementation efforts
- State regulations can be helpful for some communities, controversial for others

Consultation Meetings

In September and October of 2025 DLCD and ODOT staff held consultation meetings with affected local and regional governments as well as interested parties and organizations. Below are the key themes from those meetings.

Local and Regional Governments:

- City of Bend
- City of Corvallis
- City of Medford
- City of Portland
- Metro Technical Advisory Committee
- Metro Transportation Policy Alternatives Committee
- Metro Staff

Key Themes

- None of the affected governments expressed the need to revise the targets
- The state needs to meet their goals for local governments to meet their targets
- More transparency on assumptions and authority to implement is needed in the targets

Interested Parties:

- Phil Carver
- Bob Cortright
- Joe Cortright
- Oregon Modeling Statewide Collaborative

Key Themes

- The state isn't making progress on state-led actions assumed in targets
- The targets and STS are out of date and need to be updated
- Scenario plans aren't resulting in actions aggressive enough to meet the targets

Findings

Affected local and regional governments see the need to address climate change but have limited resources to conduct this work. State funding for planning and implementation is essential to conduct this work.

More transparency as to what is included in the targets and better delineate the authority to implement strategies from the Statewide Transportation Strategy is needed. ODOT and DLCD need to keep working in partnership with local and regional governments to ensure success.

Interested parties feel that the state isn't making enough progress on the state-led actions assumed in the STS and targets. The targets should be updated to reflect the slower progress of state actions and be set more aggressively.

Review Factor I – Land Use Studies

Land use feasibility and economic studies regarding land use densities

Background

This factor responds to concerns that the higher density land use patterns that might be needed to meet the greenhouse gas reduction targets would not be economically feasible or practicable, especially in the smaller metropolitan areas.

Analysis

In the last five years, the state has adopted several policy changes that affect land use densities. These changes include middle housing, parking reform, and climate-friendly areas.

Zoning Reform

In 2019, the Oregon Legislature passed HB 2001 and HB 2003 to help provide Oregonians with more housing choices. In 2022, LCDC adopted rules implementing these pieces of legislation. The rules ended exclusive single-family detached residential zoning in Oregon cities with population greater than 10,000 and in the Portland Metro area. As a result, denser development in the form of duplex, triplex, quadplex, cottage cluster, and accessory dwelling units is now allowed in all areas zoned for residential development. The rules also eliminated maximum density restrictions, which enables higher density development in these areas. In 2022, LCDC adopted rules for cities in the state's metropolitan areas that reformed how cities mandated minimum parking requirements. Minimum parking requirements can reduce the density of developments by forcing developers to build spaces (often at high costs) that may go unused, but which occupy space that might otherwise be developed with additional housing.

The combined effect of legislation and rules raised the lower threshold of allowable land use densities for most cities in the state. Middle housing development types can result in land use densities of 15 dwelling units per acre or more. These densities are associated with higher rates of active transportation and transit use. Reduced parking mandates are also expected to result in higher densities of development.

Climate-Friendly Area Market Feasibility Studies

LCDC adopted amendments to the Transportation Planning Rules in 2022 that requires 15 local governments that are over 5,000 in population, to designate Climate-Friendly Areas (CFAs) with capacity to accommodate 30 percent of each city's projected housing need for a 20-year planning horizon. These requirements built upon similar requirements in the Metro Region 2040 Centers.

Zoning in these areas will allow and encourage higher residential densities, mixed uses, walkable design, and transit accessibility so that residents can meet more of their daily needs without driving long distances. The success of CFAs in meeting these goals depends in part on current

market conditions. As part of the process of identifying and evaluating potential CFAs, DLCD funded nine cities to perform market studies to better understand what is likely to be developed under zoning rules and within the local development environment.

These market studies found that:

- Many development types are feasible especially low- to mid-rise residential without commercial uses. These are the most likely to be delivered by the market.
- Redevelopment will be incremental and occur in places that already are walkable or have transit access, and are low-value sites or vacant parcels.
- Tax abatements, grants, and fee waivers increase feasibility for higher-density housing, and are most successful when combined with transportation and infrastructure investments.

Low- to mid-rise development is feasible in all markets studied. The most common type of feasible housing development across all nine market studies are attached middle housing types (duplex, triplex, quadplex, and townhomes) and apartments because they are more affordable to build and are supported by current rents and home prices in these communities. In every city studied, there were also areas where 3-story walk-up apartments are feasible. These housing types encourage compact development that lessens the need for long car trips.

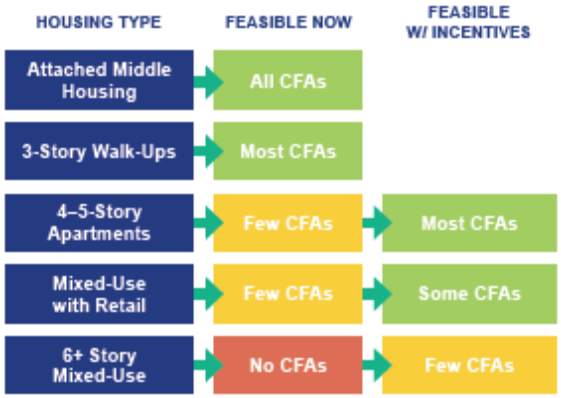

Figure 25 – CFA Market Feasibility, Source DLCD

Metro Urban Growth Report

In 2024, Metro produced an updated Urban Growth Report, which includes information on housing production in the region. The report shows that between 2013-2022, approximately half of the 93,000 housing units developed in the region were within identified Region 2040 Centers, Main Streets, and Corridors. The housing units developed within these areas averaged 48 units per acre compared to the 10 units per acre of areas outside the centers.

Findings

The land use densities required to meet the targets are feasible and policy interventions by the state over the last five years have removed barriers to infill and denser development. State policy interventions and studies on land use over the last five years indicate that the higher density land use patterns needed to achieve the greenhouse gas reduction targets are feasible in most areas. Efforts to increase housing production through the middle housing and parking reform rules and efforts from local governments have reduced barriers to higher density development and have improved the jobs-housing balance in the state's metropolitan areas.

Review Factor J – State Funding

State funding and support for scenario planning and public engagement.

Background

In developing the target rules, the commission recognized that without additional state funding from metropolitan areas would lack resources needed to conduct scenario planning. Since the targets were originally adopted in 2011, the state has committed funding to support scenario planning, local plan amendments, and voluntary efforts by other metropolitan areas.

Analysis

DLCD and ODOT have provided staff resources, technical assistance, and funding for local governments to meet updated rule requirements adopted as a part of the Climate-Friendly and Equitable Communities rulemaking. In the 2023 to 2025 biennium DLCD received $2.7 million to support local governments to implement climate-friendly and equitable communities rules.

Department of Land Conservation and Development Funding

2021-2023

The 2021-23 implementation support for cities and counties funded by the Department of Land Conservation and Development allocated $810,000 to support 15 jurisdictions with studies of newly adopted climate-friendly area land use requirements.

Climate-Friendly Area Studies and Engagement

Albany, Bend, Corvallis, Philomath, Medford, Central Point, Ashland, Eagle Point, Talent, Grants Pass, Eugene, Springfield, Salem, Keizer, Marion County

2023-2025

The 2023-25 implementation support for cities and counties funded by the Department of Land Conservation and Development allocated $2.7 million to support over 50 projects for 26 jurisdictions.

Albany	Urban design code audit, climate-friendly area market study
Ashland	Urban design code amendments, climate-friendly area zoning assistance and market study
Beaverton	Equitable engagement with transportation system plan update, urban design code amendments, low-car district
Bend	Climate-friendly area mobility study including multimodal transportation gap summary and low-car district
Central Point	Urban design code audit, climate-friendly area zoning and market study
Clackamas County	Equitable engagement with transportation system plan update

Coburg	Urban design code amendments, scenario planning support, parking reform
Cornelius	Parking reform
Corvallis	Climate-friendly area multimodal transportation gap summary
Eagle Point	Urban design code amendments, climate-friendly area zoning
Eugene	Climate-friendly area zoning, equitable engagement, scenario planning support
Gladstone	Town center zoning and market study, parking reform
Grants Pass	Urban design code audit, climate-friendly area market study
Gresham	Town center refinement
Keizer	Urban design code amendments, climate-friendly area zoning, multimodal transportation gap summary, scenario planning support
Medford	Urban design code audit, climate-friendly area market study
Oregon City	Parking reform and management
Philomath	Urban design code amendments, climate-friendly area zoning, multimodal transportation gap summary, parking management
Portland	Equitable engagement with transportation system plan update
Rogue River	Parking reform
Salem	Urban design code amendments, climate-friendly area market study, scenario planning support
Springfield	Climate-friendly area zoning and market study, scenario planning support
Talent	Urban design code audit
Tualatin	Urban design code amendments, equitable engagement with transportation system plan update
West Linn	Parking code amendments
Wilsonville	Parking reform

2025-2027

While DLCD has no identified grant funding for the CFEC program in the 2025-27 biennium, staff will continue to support local governments through technical assistance, guidance, model code, multimodal inventories, and staff support. DLCD has 2 full time positions dedicated to supporting metropolitan area local governments through the Climate-Friendly and Equitable Communities program and 3 full time positions supporting all local governments in the Transportation and Growth Management program.

Oregon Department of Transportation Funding

Planning to Meet Greenhouse Gas Reduction Targets

ODOT identified $3.5 million to support climate planning and has supported cities and counties in two regions to prepare scenario plans to meet the greenhouse gas reduction targets and in five

smaller regions to develop performance measures and targets designed to guide their transportation system plan updates and report on progress towards the targets.

Scenario Planning

Eugene, Springfield, Coburg, Lane County, Salem, Keizer ,Marion County

Performance Measures and Targets

Albany, Bend, Corvallis, Philomath, Medford, Central Point, Ashland, Eagle Point, Talent, Grants Pass

Transportation System Plan Updates

ODOT has identified approximately $7.5 million in funding to support local governments to update their transportation system plans to implement the updated Transportation Planning Rule requirements. These requirements are tied to the changes necessary to meet their metropolitan greenhouse gas reduction targets.

Direct funding assistance will be provided to Albany, Corvallis, Medford, Central Point, Ashland, Eagle Point, Grants Pass, Eugene, Springfield, Salem, Keizer, and Portland.

Findings

Since the targets were originally adopted in 2011, the state has committed funding to support scenario planning, local plan amendments, and voluntary efforts by other metropolitan areas. The updated requirements to the target rules in 2017 applied mandatory requirements for scenario planning to the Eugene-Springfield and Salem-Keizer metropolitan areas and a performance-based approach for the smaller metropolitan areas. The requirements were informed by available funding from ODOT.

The funding from DLCD and ODOT to support local governments in planning to meet the metropolitan greenhouse gas reduction targets has been either spent or committed to projects directed by the last rulemaking in 2022. While DLCD has no identified grant funding for the CFEC program in the 2025-27 biennium, staff will continue to support local governments through technical assistance, guidance, model code, multimodal inventories, and staff support.