



April 22, 2026

Land Conservation and Development Commission

Delivered via electronically

Re: Transportation Planning Rule Initiation

Hello Commissioners,

The League of Oregon Cities (LOC) represents all 241 cities across Oregon, from large metropolitan centers to small frontier communities. The LOC provides cities with what they need to build thriving communities, through advocacy, training and information. Created in 1925 through an intergovernmental agreement of incorporated cities, the LOC is essentially an extended department of all 241 Oregon cities.

The LOC expressed great concerns during the original Climate Friendly and Equitable Communities (CFEC) rulemaking and once the rules were adopted. We appreciate that at the time of adoption the commission expressed interest in coming back to the rules and making changes if those were merited.

We are pleased to see the opening of the Transportation Planning Rulemaking, which we hope will address some of those concerns. Based off the drafted notice of proposed rulemaking we are optimistic the revisions will better reflect cities capacity and allow them to better serve Oregonians.

The intention to illuminate the redundant reporting requirements or Metro is appreciated. However, the League is apprehensive about potential proposed changes to require separate corrective action for each missed target. While we understand the general premise, we are concerned that in the final rule there will not be sufficient accounting for the factors that cities cannot control in meeting or missing targets, and we hope to engage productively to address this concern in the rulemaking advisory committee. Cities further appreciate the proposed list of corrections and typos to create consistency.

The League looks forward to participating in this rulemaking advisory committee. Please let us know when and how we can engage.

Thank you for your attention to this issue,

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