

June 15, 2020

Kris Strickler
Oregon Department of Transportation
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Salem, Oregon 97301-3871

Cc: Director Whitman, Oregon Department of Environmental Quality; Director Benner, Oregon Department of Energy; Director Rue, Oregon Department of Land Conservation and Development

Dear Director Strickler and Oregon Transportation Commissioners:

As organizations dedicated to ensuring affordable, accessible and clean transportation for all Oregonians, we applaud the Department of Transportation for moving forward with its implementation of the new climate goals and directives established by Governor Brown's Oregon Climate Action Plan (EO 20-04). In particular, we were pleased to see the Department of Transportation (ODOT) establish a Climate Office to oversee the agency's implementation of the executive order's directives and other efforts to help achieve the state's emission reduction goals. We look forward to contributing to the planning and implementation of this meaningful work. In that spirit, we offer the following comments on two recent preliminary reports submitted by ODOT and other implementing agencies in response to the Executive Order. The first, "Every Mile Counts," is a multi-agency work plan for implementing the Statewide Transportation Strategy (STS), a set of recommendations for state action to reduce greenhouse gas emissions. The second is an ODOT report on agency-specific activities to address greenhouse gas emissions.

These preliminary agency reports lay out a roster of actions that--if implemented fully and promptly and supported by strong leadership and institutionalization--could have a substantial impact on greenhouse gas emissions in the transportation sector. We view the documents' proposed actions as a starting point in what we expect to be an iterative implementation process to robustly incorporate climate into ODOT's policy and investment decision-making processes. We look forward to tracking and participating in these actions as they move forward.

While ODOT's preliminary plans outline potentially powerful actions to reduce emissions in the transportation sector, they do not reflect the necessary urgency. As currently scheduled, the proposed actions will not be implemented at the speed and intensity necessary to effectively achieve climate emission reduction goals. We would like to see these processes begun immediately, with robust investment and a commitment to thoughtful but rapid progress.

Additionally, ODOT and the other agencies need to go beyond these actions in commitment to equity and climate outcomes.

Each agency needs to focus in every action on reducing barriers and delivering targeted benefits to low-income and communities of color, who are among the populations most vulnerable to the

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impacts of climate change. We would like to see a strong plan that focuses on racial equity outcomes throughout the work. While there are a few sections on equity considerations in the ODOT report, the STS work plan does not provide details on equity goals or implementation. The agencies should focus more intentionally on the equity outcomes that can be achieved throughout this work in order to deliver targeted benefits and mitigate burdens for low-income and communities of color.

Each agency must also fully integrate and prioritize climate into statewide decision-making around investments, programs and projects. The agencies should establish policies and practices that ensure that the climate impacts of all agency actions are evaluated and prioritized in decision-making.

Every Mile Counts

The multiagency “Every Mile Counts” work plan establishes important objectives. Reducing Vehicle miles traveled (VMT) and reducing the carbon impact of the remaining VMT are critical to achieving the state’s climate goals. Incorporating greenhouse gas emissions impacts in agency planning, budgets, investments and policy making decisions will be essential. We also appreciate the recognition here that actions that reduce greenhouse gas emissions often have substantial economic and equity co-benefits.

However, it is not enough to simply “strive to consider” greenhouse gas emissions in agency decision-making, as proposed in their preliminary work plan. Rather, as mandated in the executive order’s directives, agencies must prioritize and expedite processes to accelerate emission reductions and consider and integrate climate and emission reduction goals into decision-making. A stronger commitment to institutionalizing and prioritizing greenhouse gas emissions reductions will be necessary for Oregon to even come close to reaching its climate goals. The agencies can immediately redirect existing staff, investments and programs to make meaningful progress on proven, effective strategies called for by the STS.

Executive Order 20-04 - Report on Proposed Actions

ODOT’s preliminary report responding to agency-specific climate directives identifies important actions to provide financial and technical support for GHG reduction planning. Unfortunately, the proposed timeline for implementing these actions is insufficient. These actions will be tied closely to the multiagency STS implementation work, and similarly can and should be implemented quickly and fully.

ODOT’s proposed implementation plan for the Transportation Electrification Infrastructure Needs Analysis is a potentially useful action that could lay the groundwork for effective action in the future. It should be completed quickly and thoroughly and followed by strong implementation with a focus on extending the benefits of transportation electrification to low income communities and communities of color.

Further, we believe that ODOT’s proposed actions to consider GHG emission implications of projects in the Statewide Transportation Improvement Program (STIP) are potentially powerful.

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We appreciate that ODOT intends to apply an emissions lens to upcoming STIP allocations, and that the Climate Office will work with regions to influence project selection. However, we are again concerned by the report's choice of language: GHG emissions are to be simply "considered"-- rather than incorporated or prioritized--in STIP decisions, and "[t]he Agency will strive to support investments that reduce or do not increase emissions when possible, balancing other important goals like safety and the economy." This establishes an alarmingly low expectation of "consideration," raising concerns that it could be an empty exercise. Further, there is no evidence that reducing greenhouse gas emissions in transportation ever requires the sacrifice of safety or the economy; there is considerable evidence that it has positive impacts on both. ODOT should establish priorities around measuring and investing based on greenhouse gas emissions and equity impacts of its decisions. Meeting our climate goals requires that we measure and hold ourselves accountable for making progress in reducing emissions and producing equitable outcomes, especially as we make major investments in our transportation system.

Move faster and more boldly

The Oregon Transportation Commission (OTC) has expressed a desire to see the STS implementation accelerated. Given the shortfall between the state's climate goals and the trendlines if the status quo is maintained, immediate action is necessary. We urge you to consider adopting the following short-term activities:

- Begin shifting policy at a high level.
 - OTC, LCDC and EQC should adopt policy statements that direct each agency to immediately incorporate and pursue implementation of the STS in ongoing planning and policy work as much as possible.
 - OTC should focus its strategic priorities (currently in development) on greenhouse gas emissions and equity.
 - All four agencies should make funding STS implementation the top priority for use of any federal stimulus funds.
- Take immediate, strong action in areas identified in the work plans.
 - ODOT should increase investment in Transportation Demand Management (TDM) associated with ODOT's own projects, such as the trunnion replacement this fall.
 - LCDC should move forward immediately with adoption of amendments to the Transportation Planning Rule (TPR) to require the state's metropolitan areas to develop long-range plans that meet GHG emission reduction targets and carry out key strategies called for in the STS.
 - ODOT and DLCD should immediately adopt interim STS performance measures and targets to guide state and metropolitan planning for key strategies.
 - ODOT and DLCD should redirect or reprogram existing planning funds, such as Transportation and Growth Management (TGM) grant funds, to support work by the state's larger urban areas to meet GHG targets and carry out key STS strategies.

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- DEQ should establish strong requirements in the rulemaking for the ECO rule update. Extend the ECO rule to MPOs across the state and make trip reduction mandatory. Require employers to provide parking cash-out.
- DLCDC should, in the update of the Transportation Planning Rule, prohibit parking minimum requirements.
- Take immediate action on other opportunities to begin reducing greenhouse gas emissions.
 - The four agencies, in coordination with the Department of Administrative Services, should adopt a model commute options program for state employees, like the OHSU Commute Rewards program, that provides strong incentives for walking, cycling, transit.
 - ODOT should work with DEQ to expand the current air quality conformity review process to include carbon conformity to achieve GHG reduction goals.
 - ODOT should revise the Immediate Opportunity Fund (IOF) , which provides funding for roadway improvements to attract or retain businesses, to require benefiting firms to provide transportation demand management programs.

These two workplans contain significant potential to reduce greenhouse gas emissions while improving equity, air quality, safety, and access outcomes, but without strong, rapid implementation and full institutionalization, they will not measure up to the need. Changing the way that Oregon approaches transportation--our primary contributor to greenhouse gas emissions--will be critical to achieving our climate goals. Any meaningful emission reductions will require a fundamental shift in ODOT planning and investment, away from roadway expansion and toward strong support for compact communities, convenient, accessible and safe transportation options, and decarbonization of fuels. We want to see ODOT put its considerable staff and financial resources into institutionalizing this shift, and we look forward to supporting the work.

Sincerely,

1000 Friends of Oregon

350 Eugene

350 Salem Oregon

350.org Washington County

350deschutes

Beyond Toxics

Climate Solutions

Douglas County Global Warming Coalition

Environmental Caucus of the Democratic Party of Oregon

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Farmers Union, Inc.

Natural Resources Defense Council

OLCV Metro Climate Action Team

Oregon Coast Alliance

Oregon Environmental Council

Oregon League of Conservation Voters

Our Climate

Rural Oregon Climate Political Action Committee

Southern Oregon Climate Action Network

Southwestern Oregon Chapter of The Climate Reality Project