

June 15, 2020

Directors: Oregon Department of Transportation (ODOT), and Department of Land Conservation and Development (LCDC), Oregon Department of Environmental Quality (DEQ), Oregon Department of Energy (ODOE)

Re: Environmental Caucus of the Democratic Party of Oregon comments on the Draft Multi-Agency Implementation Work Plan of the Statewide Transportation Strategy: A 2050 Vision for Greenhouse Gas Reduction (GHG Reduction STS)

Dear Directors Strickler, Rue, Whitman and Benner:

Thank you for the opportunity to comment on the May 15, 2020 Draft Multi-Agency Implementation Work Plan (Draft Plan) for implementing the Statewide Transportation Strategy: A 2050 Vision for Greenhouse Gas Reduction (GHG Reduction STS). The agencies prepared this Draft Plan under the directions in the Oregon Climate Action Plan (Executive Order 20-04 or EO).

We are glad to see state agencies taking critical steps to address the climate emergency. The scientific and economic evidence for rapid action is overwhelming. The impacts to our economy and social fabric grow more dire every passing month. We share a moral duty to act swiftly and substantively to close the gap between actual greenhouse gas (GHG) emissions and new GHG reduction goals, while simultaneously adapting to the changes in climate. To that end, we submit our recommendations and comments on the Draft Plan,¹ for your consideration.

Expand Public Engagement

For too long, agencies have had strong majority corporate interests represented during government planning and decisions (*e.g.*, rules advisory committees). Despite the escalating crisis, and discussions and compromises behind closed doors, corporations have not prioritized climate solutions on a sufficient timeline as dictated by science. Under the EO, the agencies must elevate the public voices -- voices that have climate, economic and environmental justice expertise (climate organizations, vulnerable populations, and impacted communities)

Therefore, we recommend that the agencies expand Draft Plan's stakeholder and public engagements to expressly address vulnerable populations, environmental justice, and impacted communities, including rural and coastal communities. Such efforts should include the following:

- *Train the staff for this Program in equity/environmental justice*

¹ These comments focus primarily on actions where ODOT is the lead agency. Please see our comment letters to the other agencies for additional recommendations where LCDC, DEQ, or ODOE is the lead agency in this effort.

- *Ensure Stakeholder Engagements include vulnerable populations, including people of color, tribes, and other vulnerable populations such as minors and provide ample time for the agency staff to listen to these voices. Introductions should be 10 minutes or less.*
- *Develop fact sheets on: the health and social benefits of Implementing the STS and the actions in the Draft Plan, the risks of not reducing GHG emissions rapidly and substantially, and common falsehoods (e.g., the falsehood that environmental regulations kill jobs rather than shift jobs)².*
- *Encourage the voice of minors.*
- *Engage those with little or no internet access by holding in-person meetings (as COVID19 reopening stages allow), and using pre-internet means: flyers, Radio/TV/news articles, and mailing fact sheets to citizens, local public offices, community centers, and libraries.*
- *Provide copies of documents with limited color images. Please be mindful that people may want to print documents from the internet and these should be mostly in black and white as color printing is not always available or affordable.*
- *Post videos of agency presentations on the Every Mile Counts webpage and links on agency to these on other agency websites. People with limited internet often can watch videos but cannot participate effectively in a zoom meeting.*
- *Provide graphs of the emissions gap and explain it to the public and how and under what timeframes the gap will close.*

Expedite Actions by Implementing a Suite of Fast-Track Measures

Section 3B of the Executive Order 20-04 placed climate actions on a fast track. It expressly instructs all four agencies to “prioritize” and “expedite all processes, including budgets, to address GHG reductions and climate resiliency.”

There are a series of fast-track measures the agencies can use. We recommend that these include:

- *OTC, LCDC and EQC should adopt policy statements that direct each agency, local governments and the Area Planning Commissions, to immediately incorporate and pursue implementation of the STS in current planning, policy and projects as much as possible. Statements in the Draft report suggest that climate issues will be elevated to be “on par” with safety and economic development (implicitly acknowledging that being “on par” would be a significant change). However, because of the threats of the climate crisis, reducing greenhouse gas emissions is paramount to our safety and our economy. As ODOT knows, it is threatening the very stability of our roadways and transportation*

² On occasion, regulations may shift jobs but not overall employment more than other market factors. Thus, the issue is training and other programs that ensure a just transition to a climate smart economy. Hafstead, R.C. Williams III [Jobs and Environmental Regulation](#), in [Environmental and Energy Policy and the Economy, volume 1](#), Kotchen, Stock, and Wolfram. 2020

systems with cascading and escalating catastrophic extreme weather events. These policies will ensure that every employee at the agencies understands that their everyday work must be viewed through a climate lens, and that their performance on climate will be valued and evaluated.

- *Issue temporary or interim rules, orders, plans or conditions for funding or technical assistance to local governments (such as requiring five percent GHG reduction in 2020).*
- *Adopt interim STS performance measures and targets this summer to guide local, state and metropolitan planning organizations (MPOs) now.*
- *To ensure rapid implementation of climate actions, the agencies may want to consider using the Deliberative Dialogue approach with all local governments, and with its Area Commissions on Transportation, to elevate GHG emissions reduction and climate adaptation actions into being the priority and to fast-track implementation. ODOT can use this approach in-house as well. Deliberative Dialogue is a structured discussion which aims to find the best course of action. Its “purpose is not so much to solve a problem or resolve an issue as to explore the most promising avenues for action.”³ Its structure provides a forum for “thinking together” rather than debating or arguing. It allows us to listen and think together about the pros and cons of the means to attain desired ends.⁴*
- *Assist MPOs in doing strategic assessments in lieu of the more costly and time-consuming scenario planning, then speed up the technical assistance to local governments for amending projects, plans, and ordinances.*
- *Adopt agreements between and ODOT/LCDC and local governments (including the Metropolitan Planning Organizations) that fast-track embedding GHG climate actions in 2020 to achieve rapid and substantial reductions between now and 2022 (e.g., commitments by local governments to provide employees with commuting options).*
- *Issue guidance documents on best practices to reduce emissions in 2020 and 2021 and guidance on reducing emissions to the degree that an entity will not be regulated (e.g., develop interim local climate action plans).*

Close the GHG Emissions Gap with Annual GHG Reduction Targets

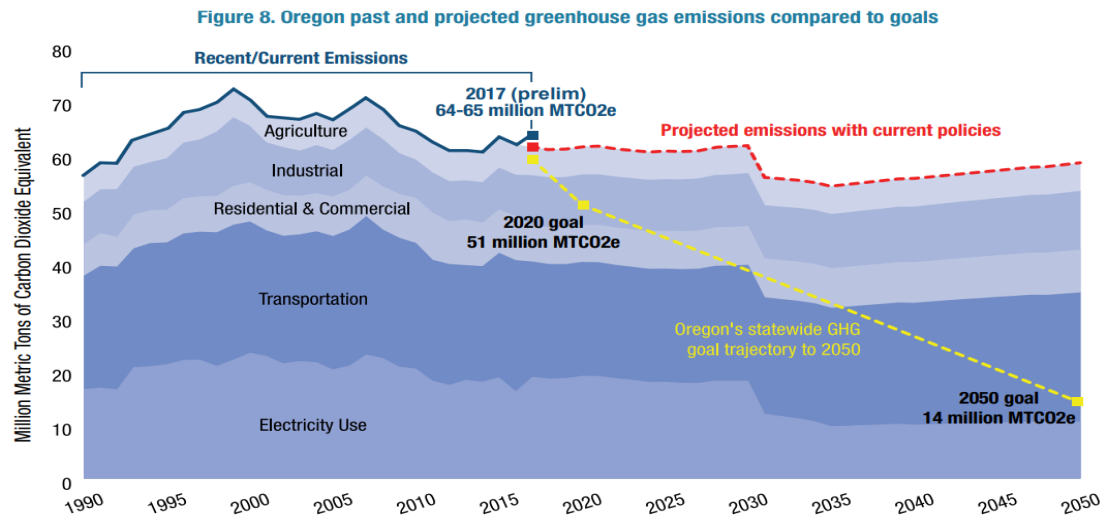
The Draft Report rightly identifies that there is a gap between the current implementation of the GHG Reduction STS and the GHG Reduction STS Vision and that Oregon is not on the right path.⁵ The past decade has shown that small steps and perpetual planning without actions are insufficient to protect our health, economy and transportation infrastructure (e.g., pilot programs and voluntary implementation by MPOs of best practices and climate action plans).

³ London, Scott. 2018. *Thinking Together: The Power of Deliberative Dialogue*, adapted from "The Power of Deliberative Dialogue," published in the book, *Public Thought and Foreign Policy*, edited by Robert J. Kingston. <http://www.scottlondon.com/reports/dialogue.html> .

⁴ For more information on moderating, visit the National Issues Forum Institute webpage at <https://www.nifi.org/en/deliberation>; for more information on the structure and process, see M. L. McCoy, P. L. Scully *Deliberative Dialogue to Expand Civic Engagement: What Kind of Talk Does Democracy Need?* National Civic Review, vol. 91, no. 2, Summer 2002

⁵ Oregon Global Warming Commission, *Biennial Report to the Legislature for the 2019 Legislative Session* (December 2018). [Meeting Our Goals](#)

Oregon's GHG emissions have increased and the gap between emissions gap and the goals (emission gap) keeps growing.⁶



Oregon Global Warming Commission, Biennial Report to the Legislature for the 2019 Legislative Session (2018).

Oregon is at a crossroads. If we do not make steep cuts in GHG emissions between now and 2025, the costs will skyrocket and the climate impacts of extreme weather will impact almost every sector of our economy.⁷ In 2019, the UN stated clearly:

Every day we delay, the steeper and more difficult the cuts become. By just 2025, the cut needed would be 15.5% each year, making the 1.5°C target almost impossible.⁸

In order to ensure that emissions are being reduced, the agencies need to adopt, monitor and enforce annual emissions reductions targets, not just plan reductions. If targets are missed, then Oregon needs to implement more aggressive measures yearly or more often. Therefore, we recommend that the schedule in the Draft Plan be revised to reflect the urgency of closing the emissions gap. Further, the Land Conservation and Development Commission voted in May, after the Draft Plan was made public, to pursue a faster schedule for adopting the Transportation Planning Rule. So the timelines need to be adjusted in the final GHG Reduction STS Implementation Plan.

Also, the public needs to be informed yearly of the steps that Oregon has accomplished in reducing GHG emissions and preparing for climate-induced disasters. For 2020, the reduction target should be a rate of 7.6% of 2010 emissions, based on the UN's 2019 models to close the emissions gap. This rate is likely to increase in 2021 if actions in 2020 are insufficient and climate impacts continue to escalate.

⁶ Ibid.

⁷ United Nations Environment Program, Emissions Gap Report 2019. Nairobi. UNEP (2019).

<http://www.unenvironment.org/emissionsgap>

⁸ [Visual feature: The Emissions Gap Report 2019](#)

Fund Coordination and Outreach for Environmental Justice and Impacted Communities

Section 3C of the Executive Order places a priority on vulnerable populations and impacted communities and requires consultation with the Environmental Justice Task Force (EJTF). These efforts need to be adequately funded in order to be effective. Let's not make the same mistake that was made with underfunding the educational and policy analyses that were legally mandated of the Global Warming Commission.

We recommend that the agencies include staffing needs for involving vulnerable populations and impacted communities and its consultation with the EJTF by adopting the various recommendations above and below. In order to achieve quality participation from rural, coastal and low-income communities, the agencies need methods that do not rely on the internet and hence it will need the staff and the funding to ensure it has a meaningful and robust program. Hence the agencies should highlight "community outreach" as part of the final version of the Draft Plan, and their budgets, which are discussed below.

Add immediate climate actions in the budget requests for staffing/funding in 2020 and 2021

We understand that it is challenging to consider implementation of climate actions without staff and funding. Because this is a crisis, the agencies should act this summer by exploring all options and then quickly shift existing staff resources away from other rules, plans, and projects into the climate actions. ODOT reports that it has about a dozen employees that work directly on climate change and sustainability, yet the Draft Plan proposes about three full-time equivalent staffing for this year and into next. It also appears that ODOT has not funded the infrastructure needs analysis this year and is waiting for the 2021-2023 budget approval. All of the agencies should explore all options to find funding to put this and other proposed actions on a fast track.

We also recommend that state agencies include robust climate actions in the budgets (Policy Option Packages) requests to the Governor's office this summer for the 2021-23 biennium. Further, the agencies should make funding STS implementation a priority for use of federal stimulus funds.

Embed the Social Costs of Carbon into all Processes

The Draft Plan has does not apply the social costs of carbon (SCC) into its objectives, including the proposed budgets. The costs of continued greenhouse gas emissions are huge. At the same time the savings from rapid reductions in carbon emissions can be significant.⁹ The federal Interagency Working Group on the Social Cost of Carbon (IWG) has calculated a SCC to reflect many of the climate change impacts on health, natural resources, infrastructure and more.

⁹ See e.g., Oregon Department of Energy, *Primer on the Social Costs of Carbon*(May 2020) [SCC Primer](#)

These numbers represent massive damages to health, property and our economy that will continue to rise due to delay in emissions reductions.

Applying Social Costs of Carbon analyses up front in the GHG Reduction STS Implementation Plan and the Every Mile Counts Program and their budgets will drive prudent policy choices.¹⁰ The Actual Social Costs of Carbon utilized should be fashioned after the 2017 IWG. The 95th percentile cost figure should be used rather than the average predicted cost. This higher figure reflects the high impact of climate change that is already occurring and better reflects true costs as the outdated traditional models omit quantification of many impacts such as ocean acidification on fisheries.¹¹ Likewise, we need to set the discount rate at 2 percent or lower given the short duration of time we have to institute reductions to avoid greater catastrophe. ODOE could easily be the lead agency in embedding the social costs of carbon into the GHG Reduction STS and the Every Mile Counts Program.

In closing, we appreciate this opportunity to encourage climate actions. We are at a crossroads; we can act now and take a path that leads us to net zero emissions and a stable economy and climate, or lock ourselves into an inescapable and deadly fossil fuel system. Oregon has a long history of leading on the environment. Working together, we can lead on climate action.

With respect,

Environmental Caucus of the Democratic Party of Oregon
Calla Felicity, Chair (Curry County)
Catherine Thomason, Vice Chair (Multnomah County)
Helen Kennedy, Treasurer (Lane County)
Justin Bryce, State Central Committee Alternate Delegate (Benton County)
Chris Moon, Chair, Green New Deal Standing Committee (Lane County)
Zach Klonoski, Chair, Membership Standing Committee (Multnomah County)

cc: Chair, Oregon Transportation Commission
Chair, Land Conservation and Development Commission
Chair, Environmental Quality Commission
Kristen Sheehan, Governor's Climate Policy Advisor
Amada Pietz, ODOT's Climate Office Director

¹⁰ See e.g., Oregon Department of Energy, *Primer on the Social Costs of Carbon (May 2020)* [SCC Primer](#)

¹¹ Paul, I et. al., Institute of Policy Integrity, *The Social Cost of Greenhouse Gases and State Policy*. Oct 2017. The https://policyintegrity.org/files/publications/SCC_State_Guidance.pdf