



January 26, 2024

TO Department of Environmental Quality

FROM: Oregon Climate Advocates

SUBJECT: FEEDBACK ON DRAFT PRIORITY CLIMATE ACTION PLAN

SUMMARY

EPA's Climate Pollution Reduction Grants (CPRG) are a key opportunity for Oregon to quickly implement effective actions to reduce GHG emissions. However, as written the transportation element of Oregon's draft plan is overly narrow, focusing almost entirely on efforts to expand adoption of EV and EV infrastructure; measures that will provide minimal benefits to Oregon's low-income and disadvantaged communities. In addition, vehicles, regardless of the power source, require impervious surfaces to drive and park. Impervious surfaces exacerbate heat islands, which impact lower income neighborhoods disproportionately, and remove carbon sequestration potential from the land. Accordingly, the transportation element needs to be expanded to include and prioritize funding programs and projects that provide transportation options - i.e. to improve opportunities for walking, biking and transit and that reduce the need for driving and car ownership and that directly serve the needs of low income and disadvantaged households and communities.

Specifically, the Oregon Priority Climate Action Plan (OPCAP) should add priority actions including the following:

- Expand transit service, especially on routes that serve low and moderate income communities
- Enable transit districts to provide free transit service or free passes, especially to low and moderate income communities and school-aged children
- Fund walking and biking improvements in low income and disadvantaged communities, for example by increasing funding for Safe Routes to School projects
- Support programs that provide paratransit, car-sharing and ride hailing services in low income communities and disadvantaged communities. like the LA' ["mobility wallet"](#) program funded by the California Air Resources Board.
- Provide incentives for purchase of e-bikes

These priority measures to expand transportation options and reduce VMT are warranted for a number of reasons:

- **Priority measures to expand transportation options and reduce VMT will better serves the needs of disadvantaged and low income communities**

The narrow focus of OPCAP on expanded light duty EV incentives will do little to help low income and disadvantaged communities, especially the neediest households that can't afford a car or that can not or do not drive. By contrast, measures to expand transportation options will provide benefits to more people and to those most in need of affordable transportation options.

- **Priority measures to expand transportation options and reduce VMT are necessary and more cost-effective than vehicle electrification in reducing GHG emissions**

A detailed review of available studies¹ shows that meeting goals to reduce transportation emissions will require both vehicle electrification and a reduction in vehicle travel. The same studies show that expanding travel options to reduce VMT is more cost-effective and that benefits of vehicle electrification in reducing emissions are generally overestimated.

- **Adding priority measures to expand transportation options and reduce VMT is called for by and implements the overall state strategy in the STS and the multi-agency “Every Mile Counts” program**

State agencies have been crafting comprehensive efforts to reduce climate pollution over the last decade, including the Statewide Transportation Strategy and, more recently, EO 20-04 and the multi-agency “Every Mile Counts” program - a partnership which includes DEQ. Together these efforts:

- establish the need for a significant reduction in VMT per capita (30% over the next 25 years) to meet GHG emissions goals, and
- Outline a comprehensive set of actions to reduce VMT per capita by expanding transportation options (walking, cycling and transit) and expanding TDM incentives.

ODOT and local communities (cities, counties, MPOs and transit districts) have numerous projects included in adopted plans that are “implementation ready” if only additional funding will be made available.

- **Adding priority measures to expand transportation options and reduce VMT will provide significant co-benefits in addition to cost-effective emissions reduction**

Measures that reduce VMT have significant co-benefits - improve safety, provide affordable options that reduce household transportation costs, improve public health by supporting active transportation options, and reduce the need for impervious surfaces.

¹ Todd Litman, [Comprehensive Transportation Emissions Reduction Planning](#), Planetizen, November 2022

- **Priority measures to expand transportation options and reduce VMT are a major part of other PCAPs in Oregon and Washington**

The OPCAP's narrow focus on EV incentives and electrification is disconcerting considering that PCAPs proposed by Metro, Oregon tribes and the State of Washington each emphasize expanding transportation options as a priority measure:

- Three of the five top rated strategies in Metro's draft PCAP list include "redesigning streets and infrastructure to reduce delays for transit vehicles", "improving multimodal access to transit stations" and "completing key gaps in the regional active transportation network" to make biking, walking and transit safe and convenient. Notably, Metro scored each of these strategies higher than efforts to support vehicle electrification or expand charging infrastructure.
- Tribal Nations priority measures for transportation included in the draft state PCAP focus on expanding improving transit service and adding walking and biking trails and safety infrastructure (OPCAP, p. 14-15)
- [Washington's draft PCAP](#) includes "complete streets (safe walking, biking and rolling) through roadway reallocation in overburdened communities" and "improving public transit service and infrastructure."

The OPCAP is a critical opportunity for Oregon to energize a broad comprehensive effort to reduce transportation emissions in a way that best serves disadvantaged and low income families and communities. Realizing this opportunity requires that the draft proposal be expanded to include the strong actions that expand transportation options and reduce vehicle travel outlined above.

Sincerely,

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