

**From:** [Robert Cortright](#)  
**To:** [CityRecorder](#)  
**Cc:** [Micki Varney](#); [Paul Tigan](#); [Eunice Kim](#); [Lisa Anderson-Ogilvie](#); [Julie Hanson](#); [Julie Hoy](#); [Linda Nishioka](#); [Shane Matthews](#); [Deanna Gwyn](#); [Dr. Irvin M Brown](#); [Mai Vang](#); [Vanessa Nordyke](#); [Phil Carver](#)  
**Subject:** [EXTERNAL]Public Testimony on Agenda Item 5d Regional Scenario Plan  
**Date:** Sunday, January 25, 2026 10:00:38 AM  
**Attachments:** [Salem Council re Preferred Scenario .pdf](#)  
[Preferred Scenario Open House \(1\).pdf](#)  
[RSP AC comments \(1\).pdf](#)

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Please provide the following testimony from 350 Salem to the City Council for their meeting on Monday January 26th.

Bob Cortright

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January 25, 2026

TO: Salem City Council

FROM: Bob Cortright and Phil Carver, 350 Salem

SUBJECT: The proposed Preferred Scenario needs to be substantially strengthened to meet Climate Goals

350 Salem advocates for and supports state, regional and local efforts to reduce greenhouse gas emissions. The regional scenario planning project and the “preferred scenario” are intended to establish a foundation and framework for amendments to city plans to meet state goals and rules to significantly reduce greenhouse gas emissions by reducing vehicle miles of travel (VMT). 350 Salem has followed this project closely. We provided detailed comments in June and July - attached - - which show that the preferred scenario is based on highly questionable analysis and will fall far short of meeting goals to reduce VMT. Our comments have largely been unaddressed.

In short, the “preferred scenario” significantly over-estimates VMT reduction effects and does too little to describe the scale of changes to existing plans that will be needed to achieve a 30% reduction in VMT per capita. **Significant additional work is needed to spell out in more detail actions, programs and investments that will be effective in reducing VMT and doubling or tripling the share of trips made by walking, cycling and transit.**

We have two major recommendations as the city moves forward with the preferred scenario and the transportation system plan (TSP) - and other city plans including the Climate Action Plan, and the Housing Production Strategy.)

**1: The preferred scenario and the TSP need to be revised to meet the state goal of accommodating 30% of all housing in Climate Friendly Areas.**

Changes to land use to accommodate most new development in highly walkable mixed use neighborhoods are essential to reducing VMT and making walking, transit and cycling convenient travel options. State programs and rules direct metropolitan cities to plan for 30% of all housing in CFAs and other highly walkable mixed use areas by 2050 in order to meet VMT reduction targets, but the Preferred Scenario calls for only 13-15% of Salem’s housing to be located in such areas. This is because other efforts to reduce VMT and expand transit and shift trips to other modes will not be effective if most housing is in car-dependent neighborhoods. For example, adding sidewalks or transit service or

incentives is much less effective in changing travel behavior when people have to walk more than a 1/2 mile to a store or transit stop.

Our comments on the city's Climate Friendly Areas study and the Housing Production Strategy (HPS) suggest several ways that the city can meet this goal, these include:

1. Adopting a goal to accommodate 30% of city housing in climate friendly areas (CFAs) and other walkable, mixed use neighborhoods. To meet this goal the city likely needs to be planning for 20,000-25,000 new housing units to be located in CFAs.
2. Committing to designate additional Climate Friendly Areas (CFAs) and other highly Walkable Mixed Use Areas with sufficient housing capacity to meet the 30% goal. The city should identify additional CFAs along commercial corridors where areas with extensive parking lots and lower value uses can be redeveloped into walkable, mixed use neighborhoods.
3. Targeting and prioritizing HPS actions to supporting housing in CFAs and other WMUAs including:
  - Action D: Funding infrastructure improvements to support housing development;
  - Action E: Revising SDC methodology by reducing SDCs for development in CFAs and other close-in walkable neighborhoods to reflect actual cost of SDC funded improvements in CFAs and other close-in areas.
  - Action G: Support Housing Development in Opportunity Areas. The city should work with property owners in these areas to develop plans and projects to support housing and other supporting uses and improvements to support walking and access to transit.

## **2. The Preferred Scenario and the TSP need to spell out actions and provide supporting analysis that shows how the city will triple the share of trips made by walking, transit and cycling.**

The Preferred Scenario claims that it will meet the VMT reduction target by roughly doubling or tripling the share of trips made by alternative modes - walking, transit and bicycling - over the next 25 years. While we agree this is the right objective, the Preferred Scenario does not explain how - i.e. what actions, programs, investments etc. will be needed and effective in accomplishing this change. Instead, the RPS analysis simply assumes that the city and region will meet this goal without explaining how that will happen. Much more work is needed to spell out the combination of actions, programs and investments that will accomplish this goal. Current adopted plans - which already call for lots of additional sidewalks, bikeways, etc. - forecast little or no change in the share of trips made by walking and cycling.

The upcoming TSP update should fill this gap by:

1. Adopting and specific goals to reduce VMT per capita and increase the share of trips made by alternative modes consistent with CFEC rules and the modeling assumptions in the Preferred Scenario work
2. Identifying actions - programs, investments and proposed improvements - sufficient to meet the VMT reduction and alternative mode goals, including supporting analysis that demonstrates that proposed actions will meet identified goals. Key actions should include:
  - Focusing and prioritizing planning for transportation improvements in Climate Friendly Areas (CFAs) and other walkable, mixed use areas needed to make these areas “highly walkable” in order to encourage and support higher density, mixed use development in these areas.
  - Developing the “high- caliber” transportation demand management / transportation options program assumed and called for in the preferred scenario.

## Conclusion

Substantial additional work is needed to translate the broad and optimistic recommendations in the Preferred Scenario into a workable, effective plan to meet city and state climate goals. Without this additional work we believe the preferred scenario will leave the city - and the region - with an overly vague and poorly documented plan that will have little effect in reducing VMT and GHG emissions. We look forward to the opportunity to work with city staff, the planning commission and the city council to address these recommendations.

## Attachments



June 29, 2025

TO: Eunice Kim & Julie Hanson  
City of Salem

From: Bob Cortright & Phil Carver  
350 Salem

Subject: 350 Salem Comments on the Proposed Preferred Scenario

350 Salem strongly supports and endorses changes to Salem's land use and transportation plans as essential steps to implement the city's climate action plan and its commitment to significantly reduce greenhouse gas emissions.

That said, as described below, we are concerned that the draft report significantly over-estimates VMT reduction effects of the proposed preferred scenario and does too little to describe the scale of changes to existing plans that will be needed to achieve a 30% reduction in VMT per capita.

Consequently, 350 Salem recommends that the city and regional partners revise and expand the draft preferred scenario to lay out in more detail the changes to land use and transportation plans that are needed to reduce VMT and that project staff provide analysis that demonstrates the effectiveness of proposed actions in reducing VMT.

Without this additional work we believe the preferred scenario will leave the city and region with an overly vague and poorly documented plan that will have little effect in reducing VMT and GHG emissions.

### **Detailed Comments and Recommendations**

#### **Comment #1: The preferred scenario is missing an essential ingredient in the recipe for VMT reduction: land use.**

Reducing VMT requires a comprehensive strategy - that increases transportation options (walking, transit and cycling) , provides incentives for using those options and creates a built environment that makes options easily usable for a large share of the population. Currently, most of the development in Salem - like most Oregon communities - is in "car-dependent" neighborhoods - where housing and jobs are too far

from key destinations like grocery stores and major transit routes to make walking, cycling or transit a reasonable option. Adding sidewalks or transit service or incentives is much less effective in changing travel behavior when people have to walk more than a 1/2 mile to a store or transit stop

The overview report says land use is important to reducing VMT<sup>1</sup> but proposes no changes to Salem's status as a "car dependent" city where most travel requires a car, mostly because houses are too far from services. The Reference Scenario document describes the importance of land use in detail:

Land use has a strong influence on our travel behavior and the transportation options available to residents. Places that are more densely built, that have a mix of uses, and that are well served by transit can provide residents with more travel options besides driving. More multifamily housing units and a higher share of households in more dense areas can help the region achieve greater greenhouse gas reductions with more people living near destinations. This reduces the need to drive longer distances and increases the potential of using active modes of transportation such as walking, biking, or taking transit. **Land use is among the most powerful policy levers available to local governments to shape transportation emissions.**<sup>2</sup>

The Statewide Transportation Strategy (STS) and the Climate Friendly and Equitable Communities (CFEC) rules direct metropolitan cities to plan for 30% of all housing in CFAs and other highly walkable mixed use areas by 2050 in order to meet VMT reduction targets. It is surprising and disappointing that the Preferred Scenario does not seriously incorporate this key strategy. Efforts to reduce VMT, expand transit and shift trips to other modes will not be effective if most housing is in car-dependent neighborhoods.<sup>3</sup>

**Recommendation #1:** The preferred scenario should be revised to accommodate 30% of households in highly walkable mixed use areas, not 13-15%.

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<sup>1</sup> The currently adopted plans in the region represent the reference scenario, or continuing with business as usual, and would result in a 10% VMT reduction by 2050 (additional details on the reference can be found in Salem-Keizer Regional Scenario Planning Reference Scenario Documentation). With the addition of state actions on more efficient vehicles, cleaner fuels and pricing that are allowable according to the administrative rules, the region would see an 18% reduction by 2050. Combined with the local actions in the preferred scenario, the region will reach a 31% reduction in per capita VMT by 2050.

<sup>2</sup>. Reference Scenario Documentation, November 2024, p. 11.

<sup>3</sup> For example, see Litman: "To be effective, a TDM program must include significant improvements in non-auto travel, financial incentives such as parking pricing or cash-out, Smart Growth development policies that allow more households to live in walkable urban neighborhoods, plus targeted travel reduction programs." [Litman in Planetizen](#) September 2023

**Comment #2. The analysis simply assumes a tripling in non-SOV mode share without any explanation of the actions needed to accomplish this outcome.**

The preferred scenario assumes/asserts that the region will more than triple the share of short trips made by active modes (biking, walking etc.) but presents little or no evidence about the scale of investments and actions that will be needed to achieve this ambitious goal. Current adopted plans - which already call for lots of additional sidewalks, bikeways, etc. - expect that there will be little or no change in the share of trips made by walking and cycling. While more bike and pedestrian infrastructure will definitely make walking, cycling and rolling safer and more convenient, where is the information or analysis that shows what level of investment is needed to triple the share of trips made by these modes? Especially when most housing and jobs are located in car-dependent neighborhoods?

The estimate of active transportation mode share is an assumption - a modeling input - - it is not an output of the model:

#### 4.3.25 DivertSovTravel

*This module reduces household single-occupant vehicle (SOV) travel to achieve goals that are inputs to the model.* The purpose of this module is to enable users to do 'what if' analysis of the potential of light-weight vehicles (e.g. bicycles, electric bikes, electric scooters) and infrastructure to support their use to reduce SOV travel.

##### 4.3.25.1 User Input Files

###### 4.3.25.1.1 Proportion of Diverted SOV Travel

(azone\_prop\_sov\_dvmt\_diverted.csv)

*This file provides inputs for a goal for diverting a portion of SOV travel within a 20-mile tour distance (round trip distance).* The user can use local household travel survey data (if available) to develop this input.

PropSovDvmtDiverted: Goals for the proportion of household DVMT in single occupant vehicle tours with round-trip distances of 20 miles or less be diverted to bicycling or other slow speed modes of travel<sup>4</sup>

**Recommendation #2:** Identify the proposed actions (investments, programs) to increase active transportation trips and provide supporting analysis to show these actions will achieve the 360% increase asserted in the Preferred Scenario.

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<sup>4</sup> VisionEval User's Guide [documentation](#)

**Comment #3: The analysis appears to double-count the effect of proposed actions on mode share and VMT reduction**

The preferred scenario includes a range of complementary policies and actions that are intended to reduce VMT per capita and increase the share of trips made by active modes. It's unclear whether the analysis considers and accounts for the overlap between "policy levers" and proposed "actions" in reference and preferred scenarios. For example, higher vehicle operating costs, road user charges, paid parking, TDM programs, and individualized marketing programs all help encourage people to increase use of active modes. All are doubtless necessary and helpful to increasing the share of trips made by active modes. However, the analysis must take care to assure that the effect of these individual actions are not double-counted - i.e. recognizing that they help achieve the 360% increase in active modes, but do not result in an increase in active trips beyond the 360%.

**Addenda**

***It's clear from VisionEval model documentation that the model calculates VMT reduction from both actions: TDM programs and achieving non-SOV short trip diversion:***

**3.6.2.4 DVMT reductions**

***Each household's VMT is adjusted for their TDM program(s) participation, if any, as well as input from metropolitan area short-trips SOV diversion goals***

**Recommendation #3:** Provide additional analysis to show that proposed TDM, individualized marketing, and parking pricing (etc) do not double-count the expected increases in non-SOV trips discussed in Comment#2.

**Comment #4: The claim that \*reference scenario" based on existing plans is expected to result in a 10% reduction in VMT per capita is contrary to the region's adopted regional plan estimates that VMT per capita will remain the same or increase slightly by 2050.**

The Overview report says: "The currently adopted plans in the region represent the reference scenario, or continuing with business as usual, and would result in a 10% VMT reduction by 2050." This is quite different from the adopted regional transportation plan which estimates that VMT per capita will remain the same or increase slightly by 2050.



In short, we have two very different predicted outcomes from the same plans: no progress vs. significant progress. If we believe that there will be significant progress, we (planners and modelers) should be able to explain why and how we think that progress will occur: ie what actions (investments, policies, programs and incentives) in our adopted plans do we expect will cause this reduction in VMT and shift to non SOV modes that the model predicts?

We suspect that the expected progress in the RSP analysis is mainly due to the bike mode share assumption in the VisionEval model: that the region will achieve the regional goal of more than tripling the share of trips made by biking and other light vehicles. This assumed shift is likely responsible for much of the expected reduction in VMT since substituting bike trips for car trips would reduce expected VMT.

**Recommendation #4:** The report needs to reconcile the conflicting estimates of future VMT from existing adopted plans.

**Comment #5: The Overview claims that proposed "state actions" are expected to reduce VMT per capita by 10% but says little about what these actions are and the state's commitment to carry them out.**

The Overview says certain proposed state actions are expected to further reduce the 10% reduction in VMT per capita in the "reference scenario" to 18%. The report needs to do much more to explain what state policies and actions are expected to be put in place and how they will accomplish this reduction in VMT. The major factor causing this reduction appears to be the expectation that the cost of driving will go up by 65% - from 66c per mile to \$1.09 per mile by 2050. While this would be certain to dampen demand for driving and reduce VMT, the analysis should provide more information to explain how this result will come about. This is especially important because the biggest variable cost of driving - fuel cost, is projected to actually drop by 50% or more - from about 10c a mile today to less than 5c per mile in 2050. (See the Preferred Scenario Summary)

What are the specifics of additional charges that will be implemented by "state actions" - including pay-as-you-drive insurance, road use taxes and "pollution fees" and what is the status of state commitments to carry out these policies?

**Recommendation #5:** Revise and expand the Overview to explain the "state actions" that are expected to reduce VMT per capita by 10%; and the state's commitment to carry out these actions.





July 21, 2025

TO: Regional Scenario Planning Advisory Committee and Project Team

FROM: Bob Cortright, Phil Carver, 350 Salem

SUBJECT: TAKE TIME TO REVIEW AND REFINE THE PREFERRED SCENARIO

350 Salem advocates for and supports state, regional and local efforts to reduce greenhouse gas emissions. This regional scenario planning project is intended to establish a foundation and framework for pursuing amendments to local land use and transportation plans to meet state goals and rules to significantly reduce greenhouse gas emissions by reducing vehicle miles of travel (VMT).

The process for public review and selection of a preferred scenario has been rushed and our analysis shows that the preferred scenario is based on highly questionable analysis and would likely fall far short of meeting goals to reduce VMT. Accordingly, **we recommend that the jurisdictions request an extension from DLCD to conduct further analysis and revise the preferred scenario to assure it would be effective in achieving climate goals.**

Rushed Process short-changes adequate analysis and consideration of public input

The process for reviewing and selecting the preferred scenario is being rushed to meet an arbitrary deadline and has provided too little time for careful deliberation and response to public input:

- The proposed scenario - which was scheduled to be produced 9 months ago - in the Fall of 2024<sup>1</sup> - has been available for public review for only six weeks.
- The approved work plan<sup>2</sup> includes a contingency task which anticipated an additional four to six months to consider additional scenarios to inform selection of a preferred scenario.
- CFEC rules allow DLCD to grant extensions or modifications to deadlines for completing scenario planning. It's almost certain that DLCD would grant an extension to allow the region to conduct additional public engagement and further refine its proposed scenario given the originally approved work plan anticipated this level of effort.

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<sup>1</sup> Final Revised Work Plan, January 18, 2024 called for introducing the preferred future scenario and seeking public feedback in August /September 2024. (page 7)

<sup>2</sup> Final Revised Work Plan, January 18, 2024 (page 2)

### Preferred Scenario is based on highly questionable analysis

As outlined in comments we submitted to staff in June, we have major concerns and questions about the preferred scenario and the supporting analysis that indicate the need for substantial additional work:

- The preferred scenario largely omits changes to land use to promote highly walkable, mixed use development despite the fact that:
  - Land use changes are foundational to reducing VMT and promoting use of alternative modes,
  - Are called for by state plans and rules<sup>3</sup> and
  - Received strong support from the public during the project's public engagement.
- The estimates of VMT and GHG reductions from proposed actions are poorly explained, highly questionable and result in overly optimistic estimates of VMT reduction. For example, the preferred scenario simply assumes that the region will achieve a 300% increase in non-SOV mode trips - without any explanation of the type or scale of investments, programs or other efforts would be needed to accomplish this increase.

### Recommendations

The Advisory Committee should direct staff to work with ODOT and DLCD to seek an extension for completing a preferred scenario and activate the “contingency task” in the approved work program that allows the region to consider additional scenarios.

The preferred scenario should be revised to:

1. To accommodate 30% of households in highly walkable mixed use areas.
2. Identify the proposed actions (investments, programs) to increase active transportation trips and provide supporting analysis to show these actions will achieve the 360% increase asserted in the Preferred Scenario.
3. Provide additional analysis to show that proposed TDM, individualized marketing, and parking pricing (etc.) do not double-count the expected increases in non-SOV trips
4. Revise the Overview report to reconcile the conflicting estimates of future VMT from existing adopted plans (The reference scenario report claim that existing plans are expected to result in a 10% reduction in VMT per capita is contrary to the region's adopted regional transportation plan estimates that VMT per capita will remain the same or increase slightly by 2050.)

Attachments: 350 Salem Comments on the Proposed Preferred Scenario, June 19, 2025  
350 Salem Comments on Proposed Performance Measures

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<sup>3</sup> The ODOT Statewide Transportation Strategy (STS) and DLCD's Climate Friendly and Equitable Communities (CFEC) rules direct metropolitan areas to accommodate 30% of all housing in highly walkable mixed use “climate friendly” areas (CFAs). The proposed preferred scenario would result in only 12% of all the regions housing in CFA type areas. (Preferred Scenario Overview, May 2025, page 5)

## ATTACHMENT

### 350 Salem Comments on Proposed Performance Measures

Implementation of the preferred scenario will be guided by performance measures. Because draft performance measures - dated July 7th - have only recently been posted on the project website, we - and other members of the public - have had little time to review and offer comments. Overall, we believe that the proposed measures are not adequate to achieve the scale of increase in mode share or reduction in VMT that is assumed in the modeling for the preferred scenario.

We have the following initial comments and recommendations on the proposed performance measures:

#### Land Use

Add a performance measure to achieve the goal of getting 30% of all the region's housing located in Climate Friendly Areas (CFAs) and other highly walkable mixed use areas consistent with CFEC and the Statewide Transportation Strategy.

Revise the transit access measures (LU1-3) to measure households that are within ¼ mile walking distance of Cherriots Core Network. The ½ mile distance measured "as the crow flies" includes areas that are inconvenient to attracting and serving transit use.

#### Transportation Options (TO1 & TO2)

The modeling assumptions for VMT reduction assume a "high-caliber" TDM efforts. Expansion of the Cherriots Employer Group pass program - which provides free transit passes - is an extremely modest incentive that - while useful - will result in only a minor increase in non-SOV travel. This measure should be revised to provide a daily alternative mode commute benefit for employees equal to the value of parking (i.e. parking cash out.)

#### VMT Reduction (TS-1)

The performance measure for VMT reduction should be amended to include the 30% reduction target considering implementation of state-led actions to reduce VMT.

#### Complete Streets / Active Transportation (TS-2 and TS-3)

These measures should be discarded because they do not clearly represent outcomes that will reduce VMT or increase non-auto mode share. Oregon law already requires that new or reconstructed streets include sidewalks and bikeways.

Add a measure for Active Transportation Spending - Percentage of street improvement funding spent on bike, transit and pedestrian friendly street improvements within Climate Friendly Areas and along the Cherriots Core Transit Network. To meet the 30% target, the region will need to get most new housing (i.e. more than 50%) in CFAs. Jurisdictions should accordingly put 50% of street improvement funding into these areas.