



The League of Women Voters of Oregon is a 100-year-old grassroots nonpartisan political organization that encourages informed and active participation in government. We envision informed Oregonians participating in a fully accessible, responsive, and transparent government to achieve the common good. LWVOR Legislative Action is based on advocacy positions formed through studies and member consensus. The League never supports or opposes any candidate or political party.

November 14, 2020

To: Christine Shirley, Climate Change Resilience Coordinator
Dept. of Land Conservation and Development
DLCD.climatechange@state.or.us

Re: Climate Change Adaptation Framework and Equity Blueprint– Support with Comments and Proposed Changes

Because the League of Women Voters of Oregon believes that climate change is a serious threat facing our nation and planet, LWVOR supports climate goals and policies that are consistent with the best available climate science and that will ensure a stable climate system for future generations. **Oregon's Climate/Carbon policies must reflect a trajectory consistent with reducing global atmospheric carbon dioxide to below 350 parts per million by the year 2100.** The League also has strong positions on air quality, land use, water quality, protecting our coastal resources, public health and others related to the various state agencies' work on climate. We follow the state budget and support investments that would implement the proposals contained in these documents.

The League engaged in and supported the creation of the 2010 Climate Adaptation Framework and has supported many of the efforts listed as progress in your update. Among the positive efforts has been the adoption of the 2017 Integrated Water Resources Strategy and Cleaner Air Oregon program. However, **we are also dismayed at the progress not made in the last 10 years.** The on-going statewide drought while also experiencing severe flooding in Pendleton, the increase in annual temperature, damaging king tides related to sea level rise along our precious coastline, and the devastation Oregonians experienced with the Labor Day fires are indications that we are behind in making the changes needed to address our changing climate. **This IS a climate emergency. We cannot wait.** *“Responding to these effects after they occur will cost much more than taking action in advance.” “The state is not on target to achieve the original 2007 GHG emissions reduction goals, let alone the 2020 goals.”* For this reason, **the League believes the state must act more urgently.**

One of our major concerns is that the very complete nature of this report may reduce the urgency for action as decision makers may find it overwhelming. It will be our collective job to assure that does not happen and urgent actions are funded. **It will be important for the Governor to clearly link these actions in her 2021 budget requests for the various agencies. Prioritizing actions that reduce life-cycle GHG emissions most quickly using the best science available should be the focus. Selecting actions that protect and/or preserve the public’s safety, recognizing that communities who are often disproportionately affected are often unheard in recommending those actions, should be next in line.” Actively engage with diverse frontline communities in a coordinated and well-resourced way so that underrepresented voices are centered in the development of climate policies, programs and public investments.”**

We are actively supporting the current state agency work as directed by the Governor's Executive Order 20-04. **Throughout the Framework , there is a recognition that the state**

needs current accurate data and state of the art information technology in order to do this work. Funding for the Oregon Climate Change Research Institute is key to connecting the state agencies' work with climate science.

We strongly support the conclusions stated in the Executive Summary and we want to emphasize certain statements by the use of *italics*-directly quoting the document in the order they appear in the document:

“Mitigation of GHGs is the primary policy of the state and should be pursued to the maximum extent possible” This policy is critical and we support the rapid implementation of the goals included in the Governor’s Executive Order 20-04.

Additionally, we believe the following information should be included at the beginning of the Executive Summary and in the second paragraph of the Purpose Section on page 3: additional information that is applicable to adaptation, including geographical locations for the various risks. See

http://www.occri.net/media/1115/oregonclimatechangeworkshopsummaryreport_fall2019.pdf.

“Global mean air temperature will continue to increase at least to the end of the century even if greenhouse gas emissions (GHG) are significantly reduced.”

“Long-term, transformational actions that anticipate future changes in Oregon’s environment and communities are necessary to address the impacts and take advantage of opportunities created by climate change.” The longer it takes for global mitigation and sequestration to occur, the more adaptation will be required.

It should be noted that although ocean acidification is primarily a global phenomenon, it can be increased locally by coastal greenhouse gas emissions, especially carbon dioxide.

(<https://www.epa.gov/ocean-acidification/understanding-science-ocean-and-coastal-acidification#closer>)

We appreciate the inclusion of the box containing the definitions of “mitigation”, “sequestration”, and “adaptation”. We suggest adding “resilience” to the definitions, as it is used in the document.

We also appreciate the box on page 6 noting the difference between “Coping versus Adaptation”.

We realize that this document is intended to deal only with adaptation to the effects of climate change. However, it is very difficult to separate this from mitigation and sequestration. For example, improved forest management is an adaptation to limit the scope of wildfires, but it also keeps the carbon sequestered in the trees that otherwise would have burned, possibly emitting greenhouse gases. Healthy soils can make crops more resistant to the impacts of climate change, such as pests, while also sequestering carbon. In addition, there are non-climate change related risks that affect the same geographical areas such as the Cascadia earthquake. Adaptations against climate-change induced sea-level rise should probably be considered along with the rise due to the potential tsunami.

We appreciate the acknowledgement that, in predicting the impacts of climate change, we can’t depend on past history. It should also be mentioned that climate change impacts do not increase

linearly with increasing greenhouse gases, especially because of potential tipping points and feedback loops.

Consider incorporating in the section on Flexibility: **Climate change has two different types of impacts: One changes gradually from year-to-year, affects large areas, and can probably be predicted at least a few years in advance based on greenhouse gas concentrations.**

Examples would be warming that affects where particular crops can be grown or sea-level rise. It would make sense to seriously consider adaptation. **The other is the episodic events like floods and wildfires, for which the timing and location can't necessarily be predicted.** For these, it makes sense to consider whether adaptation or resilience is the best approach.

“State agencies will need to be flexible as projects are planned and designed....”

“...improvements will not be made without increased investment in rebuilding trusting relationships.”

Among the implementing recommendations we support are the **establishment of a multi-agency leadership structure that includes better interagency coordination, including the ability to work with agencies to establish timely progress benchmarks and, at a minimum, publishing a biennial progress report.** We supported the creation of an Oregon Climate Authority in 2019 and look to that model as a possibility. *“A coordinated government response would ensure wide-ranging benefits, reduce conflicts, and achieve balance among sectors in a way that maximizes outcomes for the state’s natural resources, economy, and communities.”* While we support this idea in the near term, we also want to be assured that the public will be included in final decisions. The state needs to reduce silos around climate change actions: **adaptation, mitigation and resilience actions should be linked.**

Leadership is only successful if followers believe they have been heard and **the decisions made benefit all Oregonians and are made in the public view.** That is why we also support the recognition that **inclusion, diversity, and equity should be guiding principles.** *“...state agencies will have a continuous need to collaborate to align policy and programming, coordinate data collection and analysis, leverage resources, and effectively engage with the public.”* **The proposed Climate Equity Blueprint is a good first step to guide this engagement effort. As we move forward, we expect updates to improve as more formerly disengaged community members participate and help define best practices.** We note that there are other similar documents such as the Environmental Justice Task Force Best Practices Handbook. Again, coordinating efforts and less duplication will better serve Oregon.

We do NOT support investing valuable time and state money in a climate change vulnerability assessment as suggested on page 15, especially using a 14-year old model. First of all, the vulnerability from climate change affects the same communities affected by other risks, such as co-pollution from stationary greenhouse gas emitters that also emit toxic co-pollutants, both of which could be reduced by greenhouse gas mitigation efforts. Secondly, we believe most of the data needed is already available and that the Oregon Climate Change Research Institute or Global Warming Commission could take the lead.

Although we support a coordinated climate action website, we know that the public often seek information as it relates to their lives or their jobs. It is unlikely that they would look for a website dedicated to adaptation. It should be a more general site, possibly in the Governor’s Climate Office. It will also be important to continue providing information on each agency website that

prominently links to actions each agency is taking to accomplish their climate goals and progress they have achieved.

Develop guidelines ...on the use of social cost of carbon when conducting cost-benefit analyses for climate change adaptation measures." The social cost of carbon is applicable to activities that affect the emission of greenhouse gases. However, it would only be applicable to combined adaptation/mitigation activities and should be handled by those dealing with the mitigation aspects. The fact that adaptation goes along with the mitigation could be considered a plus in selecting mitigation activities, just as the equity lens is also considered.

The League appreciates the report's attempt to divide the work into six themes. However, just as we have 24 state agencies providing input to this report that need coordination, we can see that same need around these themes. **Every subdivision dilutes the need for comprehensive action.** We note that there is some duplication due to this division; for, example, ocean-related impacts (including acidification, which is not actually a climate change impact; it's due to carbon dioxide going straight into the ocean) are under both Economy and Natural World. However, salmon are not included in Cultural Heritage, even though they have both cultural and economic importance for at least some of the tribes.

Most of what is discussed in the Economy section is mitigation rather than adaptation. It's not clear if there is a document where worker training should be discussed. It definitely requires an equity lens. It should include those losing jobs due to the mitigation activities or climate change impacts.

Also, this section should have a discussion of agriculture, rather than the brief mention in Natural World, where none of the strategies applies to it. The Dept. of Agriculture should be able to provide some strategies.

...adoption of mapping and engineering tools for adaptation planning. With these tools, Oregon can develop focused strategies for mitigating risks, such as recommendations regarding location of new construction, city planning for additional tree canopy, adoption of building standards for fire-resistant construction, and meeting distributed energy and emissions reduction goals in the built environment.

Ports and coastal community infrastructure planning for renewable energy development will be critical to accessing wind energy. The wind resource off the southern coast of Oregon is plentiful, and would add stability to energy generation as sustainable energy platforms are developed in the state. The additional jobs required for harvesting this resource would add economic stability to coastal communities.

"For indigenous peoples, the environmental impacts of climate change and some of the proposed solutions threaten ways of life, subsistence, land rights, future growth, cultural survivability, and financial resources." We strongly agree with the above statement. Unfortunately, this section deals only with "cultural landscapes and resource areas" and not with the many threats mentioned. For example: "We are trying to preserve and restore traditional foods as they become further threatened by climate change. The salmon provide complete nutrition, and they nourish our forests. Salmon is not just a food source, but a spiritual part of us and this place."

- Delia Sanchez, Grande Ronde Tribe (From the "Oregon Climate and Health Profile Report" 2014)

“Unexpected population or demographic changes” We definitely agree population change is an important vulnerability, but believe that, because of Oregon’s desirable climate, there will definitely be an in-migration of people from areas being impacted. We suggest including an item under “Focus Preparedness on Future Impacts” to work with PSU’s Population Research Center because of their role in population forecasting.

The League encourages a continued leverage of state resources to focus on intra- and inter-state regionalism best practices. Collaboration with our neighbors can bring positive outcomes including an economic WIN-WIN in many cases. Examples: [Covering Your Climate: Pacific Northwest Rides Adaptation Wave](#), [Pacific Coast Collaborative Launches Climate Resilience Effort, A Modern Case for Regional Collaboration](#), [Oregon Conservation Strategy](#) and [American regionalism: Convergence on COVID-19](#).

We urge adoption of these important documents and we ask that you consider these recommended changes. More importantly, we urge funding and action to implement the many recommendations.

Thank you for the opportunity to discuss these important guidelines to help Oregon deal with the many crises around the effects of climate change.

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https://www.oregon.gov/lcd/CL/Documents/CLIMATE_CHANGE_ADAPTER_FRAMEWORK_08-12-2020.pdf

https://www.oregon.gov/lcd/CL/Documents/Draft_Equity_Blueprint_20201012.pdf