



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.

October 27, 2020

To: Catherine MacDonald, Chair, Oregon Global Warming Commission
Members of the Commission
Oregon.GWC@oregon.gov; info@keeporegoncool.org

Re: [Draft 2020 OGWC Biennial Report to the Legislature](#) - Comments on the Report and Agency Implementation

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 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.

Thank you for the opportunity to comment on the OGWC Draft Report. We appreciate the level of detail and analysis that has gone into the review of agency implementation plans for Governor Brown's Executive Order 20-04 in this draft. Our comments are arranged to reflect the sections of the Report to which they respond. We ask that you consider amending the draft report to reflect these concerns.

Summary/Funding:

The League agrees with your report that reflects your recommendation for full funding of the Governor's Executive Order 20-04: *"In this biennial report, the OGWC strongly recommends that the Legislature fully fund the needed rulemaking and agency work plans called for in EO 20-04 and we highlight 31 additional actions that should be taken to help Oregon get back on track toward our climate mitigation goals."*; especially, the Recommendations: 4) **Protect funding that the agencies need to advance the directives in EO 20-04.** And 5) **Increase funding for the OGWC to expand staff and analytic capacity.**

Serving Impacted Communities:

We recommend recognizing farmworkers among those exposed to health hazards brought on by climate change.

We support Recommendations 1 and 2. We recommend this addition:

Recommendation 3: Vulnerable community members do not have lobbyists with extensive experience influencing legislative and agency decision-making. We recommend that the composition of the Rulemaking Advisory Committees for all agency programs have an over representation of historically underrepresented communities in order for their perspectives to have weight in the discussions and program design adoption.

Governance, Transparency, Accountability and Resources:

We advocate for easily located "Executive Order 20-04 Climate Implementation" information on the main webpage of all involved agencies, commissions and task forces, with links to relevant upcoming and past meetings, materials, and programs. In documents detailing planning and program development, we

advocate that agencies include a sidebar that identifies how the program prioritizes climate mitigation and how it will benefit Environmental Justice (EJ) and other vulnerable communities.

We support Recommendation 5, and would like to see it expanded:

The Biennial Report reflects important considerations in going forward with program development. The resources and time to provide climate information to Oregonians have been missing from previous efforts to pass climate legislation. In addition, we have not highlighted the solutions embedded in the programs. We must explore diverse ways of reaching out to hear concerns and to discuss the critical nature of our shared emergency. It is important that trusted community members are involved in presenting options for participating in the solutions.

Some examples to include: where, how and for what kinds of jobs will training occur; how farming practices can evolve to improve soil moisture and sequestration and reduce fertilizer use; how the program can be designed to provide financial incentives or rebates to upgrade for lower- or zero-emission equipment; how transit can be sited and developed in all metro areas; where public EV charging infrastructure can be located in all communities, etc. Granges, local teachers, OSU extension agents, Sea Grant fellows, community colleges, farm bureaus, places of worship, and community centers of all sorts must be enlisted in this effort.

Regulating Reductions in Greenhouse Gas Emissions:

We agree with Recommendation 9 that DEQ should develop a robust Cap and Reduce program that will have broad coverage within the covered sectors and a stringent cap that lowers quickly. **The program should rapidly reduce emissions on a pathway to reach net-zero by 2050.** The DEQ workshop on stringency discussed the setting and rate of reduction of the cap.

We believe the penalty for non-compliance should be specified in the Recommendation to be a critical component to ensure a stringent cap. Penalties must be well-defined and implemented consistently and quickly. **The cost of non-compliance must exceed the cost of compliance.** If a regulated entity considers the penalty to be an acceptable cost of business-as-usual, there will be no incentive to achieve the mandated emissions reductions.

We recognize that some flexibility should be provided for early modifications that will take some time to implement. However, the program must ensure that this flexibility not be used as an escape hatch for the regulated entity to avoid making feasible reductions. Whenever possible, flexibility options should be associated with decreasing the negative effects of climate change, the health impacts of co-pollutants, and the costs of the program for communities that are the least able to make accommodations.

Transportation:

Recommendation 18: We support an expansion of the populations with priority to receive training to include persons displaced by workplace contraction or transitions due to climate program adoptions.

Recommendation 19: We support the addition of metrics to evaluate whether application of the “GHG lens” results in a departure from business-as-usual. Does the STIP developing for 2024-2027 have significant investment in emissions-reduction priorities?

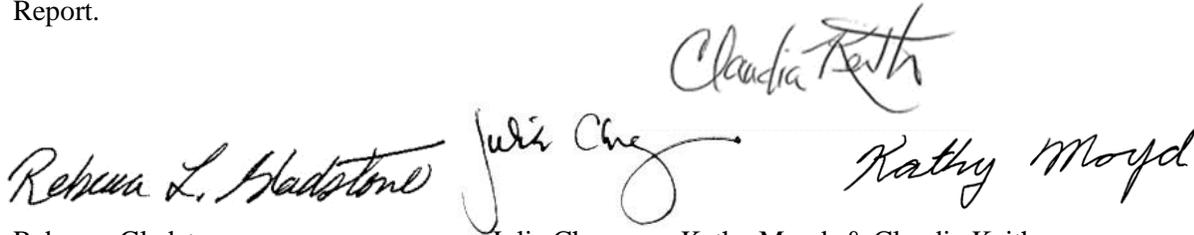
Natural and Working Lands:

The principles and scope of work are well organized, well thought out and researched. The benefits for nature-based solutions to significantly reduce legacy carbon and also bring about significant co-benefits are well drawn. The use of the word “inventory” was not clear to a lay audience, and it would be helpful

to have that term defined: “listing and giving the amounts of greenhouse gas emissions from a particular source” (if that is accurate).

Recommendation 30: It is not clear exactly how soil health data will be used to "assist with goal setting." Soil health data can include a variety of measurements but the values depend on the past management practices and can be very variable. An example of such a database: <https://data.nal.usda.gov/dataset/data-database-global-soil-health-assessment>

Thank you for the opportunity to provide comments for the Draft Oregon Global Warming 2020 Biennial Report.



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Cc:

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