



The League of Women Voters of Oregon is a 101-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.

December 7, 2020

To: Colin McConnaha

Manager, Office of GHG Programs DEQ Cap and Reduce Program

CapandReduce@deq.state.or.us

Re: **Cap and Reduce Scenarios**

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.

We appreciate the work DEQ has done with the Technical Workshops, Town Halls, and the December 2 Illustrative Scenario Discussion to develop the Cap and Reduce program.

The goals in Executive Order No. 20-04 are already less strict than necessary to meet the 2018 IPCC global target of net-zero emissions by 2050. We recognize that the longer it takes to reduce emissions, the greater the climate change impacts. **The EO goals for 2035 must be treated as seriously as those for 2050.**

We realize it is a complex program with competing goals and especially with respect to the Equity concerns will be difficult to accomplish without legislative support. No matter how well the program is modeled and designed, over thirty years, conditions will change; the program has to be designed so that it can meet the goals independently of the changes.

We appreciate the “Emissions, Equity, Cost” triangle showing the competing goals. However, we would like to see the “Cost” apex changed to “Economics” to indicate that benefits from the growth of clean-energy jobs and the avoidance of the negative impacts of climate change are to be taken into account in addition to the costs of reductions for the regulated entities.

We believe it is important to identify early in the process which greenhouse gases and sources of emission are to be regulated, including setting the threshold for which specific entities will be included. This will allow giving notice so that the regulated entities can start planning for an early start of the program.

All greenhouse gases should be included unless there is a significant reason for exemption. Emissions from non-regulated types of gases or sources will cause the cap to be lowered on the regulated ones to meet the EO goals.

For some sectors there may be a trade off in setting the threshold. Setting the level too high will cause a significant amount of emissions to be unregulated; setting it too low will cause increased administrative burden on DEQ with little effect on reaching the caps.

Considering the differences among the sectors being regulated, we believe the various components of the program should not have to be the same for all sectors.

We agree that some flexibility may be necessary to achieve rapid early reductions. However, the primary intent should be to have the regulated entities decrease their emissions. Therefore, use of flexibility options, especially later in the program, should be dependent on regulated entities showing realistic long-range plans for how they will meet the caps.

Alternative compliance instruments should be limited to emission reductions in Oregon. Priority should be given to those benefitting impacted and environmental justice communities.

We hope you find these comments helpful as you enter the Rulemaking phase.



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