

Southern Oregon Climate Action Now

**SOCAN**

Confronting Climate Change

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Colleagues:

I write on behalf of over 1500 Southern Oregonians who are Southern Oregon Climate Action Now and who are committed to promoting understanding and awareness about the science of global warming and its climate change consequences as well as promoting individual and collective action to address it. I offer the following comments regarding the 1<sup>st</sup> Rulemaking Advisory Committee meeting on January 14<sup>th</sup> 2021.

Before offering my comments and concerns, I would first like to offer our appreciation to DEQ staff for their concerted and transparent efforts to develop a meaningful Oregon Climate Protection Program to reduce emissions from stationary sources and also to the members of the RAC who clearly came prepared to assist in this endeavor.

Please note that these comments are not organized in rank order of importance.

- 1) We would like to remind everyone that the goals identified in the Governor's Executive Order 20-04 are to achieve a 45% reduction from 1990 emissions by 2035 and at least 80% reduction by 2050. Since best available science as reported by the IPCC demands the global achievement of net zero emissions by 2050 the phrase 'at least' in the EO needs to be incorporated into agency thinking and planning. It is disturbing to see that DEQ seems to have adopted the approach that the Climate Protection Program it is developing for stationary sources does not need to meet the goals stipulated in the EO. It is not clear how firm this view is since, despite the expressed view, the model scenarios included the EO goals suggesting that these were considered important at some stage in the deliberations. This concern is amplified by our engagement with other agency efforts and a growing realization on our part about what these other agencies are doing. It seems that there is a covert consensus developing among agencies that none is committed to the EO interim target and ultimate goal. Clearly, it would appear to us, that if every agency is leaving the heavy lifting to everyone else, the Governor's laudable EO goals are doomed.
- 2) If the EO goals are to be achieved, the program developed must be economy-wide requiring that all sectors are targeted with reduction. If this is not undertaken, the onus will fall more heavily on those sectors included, again undermining the potential for the program to achieve the EO goal. For example, if electricity generation is exempt, a sector that is responsible for some 25% of total regulated GHG emissions, then other sectors will necessarily be required to pick up the slack.
- 3) We realize that biogenic resources are defined as renewable in Oregon. However, they still emit greenhouse gases that contribute to the problem. The principle that biomass emissions result from

the release of carbon dioxide back into our current atmosphere rather than being transferred to this atmosphere from one several hundred million years ago is specious. We know that the time taken for vegetation to recapture the emissions resulting from the combustion of biomass is far too long compared to the decade we have to undertake substantial emissions reductions. Again, eliminating biogenic emissions results in other sectors having to pick up the slack. The continued use of biomass as an energy feedstock also dictates the need for the program to incentivize biomass combustion reductions and carbon sequestration through Alternative Compliance Options (ACOs) - see 5 below.

- 4) It is well understood that we do not have centuries to address this problem. Urgency is imminent; we have a matter of a decade to reduce emission substantially. This means that using the 100-year carbon dioxide equivalent to assess the threat posed by greenhouse gases is inadequate. A critical related concern is that assessments of the CO<sub>2</sub>e are updated regularly as scientific progress is made. This means that using the CO<sub>2</sub>e values from the IPCC AR4 renders the values outdated. We understand that the EPA uses outdated values, but that was during the Trump Administration which consistently resisted any effort to address global warming. There is no satisfactory justification for Oregon's DEQ to be locked into those outdated values. Thus, we urge using the 20-year CO<sub>2</sub>e values and the values reported at least in AR5, and then AR6 when those values are available.
- 5) We recognize that the Climate Protection Program focus is on emissions reductions, but, as has been recognized by the IPCC, carbon sequestration is also essential. This is also recognized in the goals of the EO which include carbon sequestration. While the DEQ Climate Protection Program has a primary focus on reducing emissions from stationary sources, it is important to remember that the DEQ program should also support the efforts of other agencies in achieving their goals. Thus, in the arena of Natural and Working Lands, it is expected that carbon sequestration will be encouraged. This will require financial incentives. Within the overall Oregon Climate Action Plan, pretty much the only potential source of funds to invest in forestry and agriculture will be through Alternative Compliance Options (ACOs - offsets) that allow polluters to achieve some of their emissions reductions by investing in carbon sequestration forestry or regenerative agriculture. While such options should be available, rules governing their availability should be carefully constructed such (for example) that limits exist on the amount (or percent of their obligation) of pollution that users can include in meeting their obligation. Additionally, ACOs should be available only if to entities that have either installed, or have firm plans to install, best available technology.
- 6) The program should acknowledge efforts already undertaken by entities so they are not treated prejudicially compared to entities that have, since 2007, been the recalcitrant cause of the failure of the state to achieve its 2007 targets.
- 7) It is critical that all efforts to reduce emissions or promote carbon sequestration should embed the concern about environmental justice and social equity. Failing to do so will not only undermine the specific inclusion of such concerns in the Governor's EO, but will also further the historic injustices and inequities, and lead to resistance to the program from those communities.
- 8) Finally, in terms of the rural-coastal / urban divide raised as a word of caution by one RAC member, I stress that this is largely a fabrication of the opponents of prior legislation. Opponents of prior legislation confused the public with erroneous claims about how proposals would negatively affect them and consistently refused to acknowledge the potential economic and health benefits that would accrue to Oregonians as a result of those proposals. That divide will only recur if opponents undertake similar campaigns of misinformation in connection with the Climate Protection Program in particular and the overall Oregon Climate Action Plan generally. In fact, many of us living in rural

Oregon recognize that we are on the frontlines of climate change and that addressing the underlying cause is critical to protecting our way of life. In addition, many of us realize that a well-constructed Climate Action Plan can actually provide economic benefits to our regions of the state.

Thank you for providing he opportunity for public comment.

Sincerely

A handwritten signature in black ink that reads "Alan Journet". The signature is written in a cursive style with a large initial "A" and a long, sweeping tail.

Alan Journet

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