

Southern Oregon Climate Action Now

SOCAN

Confronting Climate Change

<https://socan.eco>

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Chair George and members of the Oregon Environmental Quality Commission:

I write as cofacilitator of Southern Oregon Climate Action Now, an organization of over 1500 rural Southern Oregonians who are concerned about the climate crisis and serve to fulfil our mission of promoting awareness and understanding of the science of climate change and its consequences and stimulating individual and collective action to address it through a lens of climate justice.

As a result of Governor Brown's Executive Order, Oregon state agencies are developing programs that will reduce greenhouse gas emissions throughout the state in a substantial downward trajectory with meaningful goals. A critical program among those under consideration is the Clean Fuels Program.

Before offering comments on the Clean Fuels Program, I would like to express our appreciation to the EQC for (1) urging that DEQ strengthen its initial Climate Protection Program draft, and then (2) approving the amended proposal. We urge the EQC stand firm against the lawsuits filed by industries who were represented on the Rulemaking Advisory Committee and thus offered advice on the program as it was developed.

In terms of the Clean Fuels Program, I remind the EQC that the transportation sector of our economy is the largest emitter of regulated greenhouse gases in the state. It is, therefore, the sector that offers the greatest opportunity to fulfill Governor Brown's charge in EO 20-04 to reduce emissions substantially. If Oregon is to accept its responsibility for reducing statewide emissions consistent with those recommended by the Intergovernmental Panel on Climate Change (IPCC), we must demand that transportation achieve increased reductions. It is worth recalling that transportation is one sector that declined to comply with 2007 HB3543 by reducing emissions voluntarily. Thus, regulations were necessarily imposed initially in 2009 and then implemented in 2016 to address the carbon intensity of transportation fuels and demand its reduction.

While the CFP has been effective in reducing transportation emissions, progress has not been sufficient to meet the recommendations of the IPCC as modified over the years because the need for increasingly rigorous reductions has become more urgent.

The urgency of the crisis demands that every jurisdiction wishing to preserve some semblance of life across the planet as we know it should take whatever steps it can to require substantial emissions reductions. In Oregon, a Clean Fuels Program that imposes reductions beyond the currently proposed 20% below 2015 levels by 2030 and 37% below 2015 levels by 2035 represents a critical contribution to our statewide effort.

In addition to addressing the climate crisis, meaningful greenhouse gas emissions reductions will provide valuable health benefits, especially to the low-income and vulnerable communities that live adjacent to our major highways.

In closing, I note that the [Swiss Re study](#) of the economic impact of unfettered climate change, adjusted to the state level, conservatively estimates that the cost to Oregon will annually reach \$48 billion. It is economically far less expensive to address the climate crisis than leave it unaddressed.

We urge that EQC approve rigorous strengthening of the Clean Fuels Program with a focus on electrification rather than the incorporation of biofuels which are questionable in terms of their lifecycle emissions and which also can, in some cases, compromise the availability of food staples and food items. If Oregon wishes to remain a national and international leader in environmental and climate protection, we should do our part!

Respectfully submitted

A handwritten signature in black ink that reads "Alan R.P. Journet". The signature is written in a cursive, flowing style.

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