

Southern Oregon Climate Action Now

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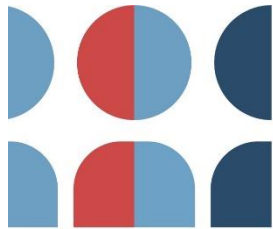
Confronting Climate Change

<https://socan.eco>

CLIMATE ENERGY & ENVIRONMENT TEAM



**CONSOLIDATED OREGON
INDIVISIBLE NETWORK**



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**INDIVISIBLE
NETWORK**

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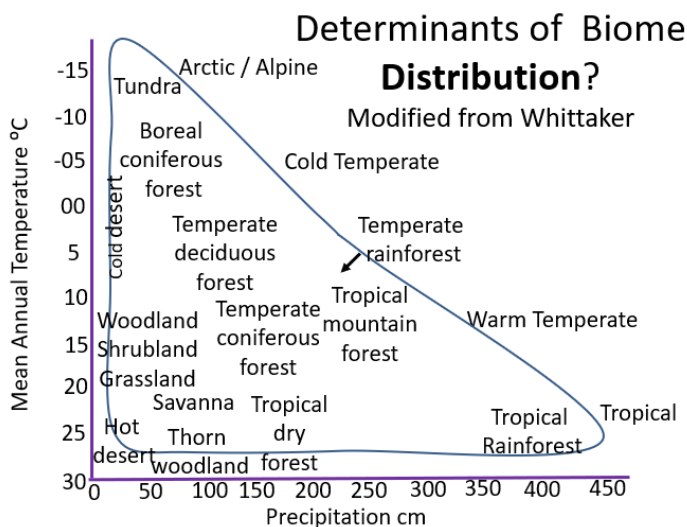
541-500-2331

August 5th 2024

Nicole Singh and Colleagues in the Department of Environmental Quality (DEQ) Office of Greenhouse Gas Programs:

I write as cofacilitator of Southern Oregon Climate Action Now, an organization of some 2,000 rural Southern Oregonians who are concerned about the climate crisis and encourage state action to address it. As rural and coastal Southern Oregonians, we live on the frontlines of the warming, reducing snowpack, heatwaves, drought, sea level rise, and the increasing wildfire risk that these trends conspire to produce. Because of this, we pay close attention to what is happening statewide in terms of agency programs and legislation that impacts our state's contribution to the climate crisis. I also write as a cochair of the Climate, Energy and Environment Team of the Consolidated Oregon Indivisible Network comprising many rural Oregonians and on behalf of COIN itself.

I also write as a retired ecologist with decades of experience teaching ecology and conservation biology and conducting ecological and conservation research in the bottomland hardwood forests of Southeast Missouri and the tropical moist forests of Northwestern Costa Rica. These experiences combined to demonstrate to me how climate projections suggested some 20 – 30 years ago would, if they come to pass, devastate our natural ecosystems and the biodiversity they support along with the agriculture, forestry and fisheries that support *Homo sapiens*. As



the chart below, modified from the biome distribution chart of Robert Whittaker (1975), indicates, natural ecosystems across the planet are arrayed with limited ranges of temperature and annual precipitation. Even small shifts in temperature of just a few degrees or precipitation of just a few centimeters can have a huge negative impact on the ability of natural ecosystems across the planet to survive in their current locations. This biological reality is

what generated my concern about the pending climate crisis decades ago. Since then, we have been following the most serious climate trajectory indicating that the devastation suggested by this chart is likely to befall us before the end of this century unless we take dramatic action to divert that trajectory. Indeed, the accelerating extinction rate that we are witnessing is evidence that this concern is reasonable. The wave of Douglas fir death sweeping our region especially is further such evidence. The Climate Protection Program represents Oregon's best contribution to assisting the necessary diversion of the current climate trajectory.

It is in this context that I write today in connection with the proposed revised Climate Protection Program. On behalf of Southern Oregon Climate Action Now, I have been consistently engaged in the public Hearing and Rulemaking Advisory Committee d(RAC) discussions regarding both the previous and this proposal. I congratulate DEQ for their decision to focus, in the development of a revised Climate Protection Program (CPP), on the previous version approved by the Environmental Quality Commission (EQC).

I confess, however, that I have been just as consistently appalled by the contributions to these efforts of representatives of the fossil fuel industry. While these representatives seem insistent that they agree with the need to address the climate crisis, their contributions deny this claim. Rather than coming to the table with a genuine concern about addressing and reducing their emissions, time and again their input focuses on how they should not be required to reduce emissions if this is the least bit inconvenient. The fact that the same entities claiming to take the climate crisis seriously and contributing to the original RAC discussions should have been the ones to take legal action against the CPP adds further to our skeptical judgment regarding their sincerity and good faith engagement.

The track record of the fossil fuel industry in Oregon in the above arenas leads me to urge DEQ to reject pleas from these entities to relax the rules to provide them exemptions from its requirement of reducing emissions on the trajectory stipulated.

We are glad to see that the proposed rules maintain the targets of 50% reduction by 2035 and 90% by 2050. We are also pleased to see the requirement that all entities seeking to apply offsets as a means of meeting some portion of their obligation will need to do so through a strong Community Climate Investment (CCI) mechanism and will not be permitted to engage in independent agreements to offset emissions through questionable agents outside the program. I urge DEQ to retain this component and restriction. We are also pleased to see that the CCI entities will still be required to be non-profits. It is absurd to have CCI funds serving the profit-making goal of entities.

We are, however, disappointed that DEQ is electing to reward some polluters for their efforts by proposing a one-time distribution of compliance instruments. While we can understand the value of rewarding good behavior, it is also important to realize that we are in this deep climate pollution hole now because our fossil fuel users did not comply with the voluntary Global Warming Pollution Reduction Act (House Bill 3543) of 2007. Had they taken steps to address their emissions in the more than a decade that elapsed between 2007 and 2021, the CPP would not have been required now. Furthermore, had these entities not filed suit to halt the program, Oregon could be well on its way to reducing emissions by now. This component almost looks like a reward for their effort to undermine the program.

Oregon residents exposed to the risks imposed by climate change, especially those of us on the rural frontlines, are pleased to see a program that is rigorous in its demand that polluters reduce their emissions on a meaningful science-based trajectory. We understand fully that Oregon's best steps in this regard will not be sufficient to divert the global trajectory of increasing greenhouse gas emissions, but we demand that Oregon contribute its share to addressing the problem. If we don't make our commitment, we lose all authority and credibility when urging other jurisdictions to do their share.

The bottom line is that we encourage DEQ to proceed with a strong science-based program that keeps the state on a meaningful downward trajectory in greenhouse gas emissions. We also urge that program approval should be achieved before the end of the year in order to avoid undue delay. It's time to get back on the emissions reduction schedule established by the original CPP.

Respectfully Submitted

A handwritten signature in black ink, appearing to read "Alan P. Journet". The signature is fluid and cursive, with the first name "Alan" and last name "Journet" clearly legible, and "P." as a middle initial.

Alan Journet

Source Cited

Whittaker, R.H. (1975) *Communities and Ecosystems*. 2nd Edition, MacMillan Publishing Co., New York.

Addendum:

I draw your attention to the typographic error on p 45: “(a) Provide covered entities with an optional means of meeting part of their compliance obligation for one or more **compli468.035ance** periods;”