

To: Dept of Environmental Quality, Office of Greenhouse Gas Programs
Re: Rulemaking Comment—The Climate Protection Program
From: The Lake Oswego Sustainability Network (LOSN)
Date: September 12, 2021

The Lake Oswego Sustainability Network (LOSN) is a nonprofit organization committed to promote sustainability in our community. We offer events and projects, and hundreds of local citizens are involved in our efforts. Lake Oswego residents, businesses leaders, and young people, want to create a safe future by reducing greenhouse gasses. Our city council recently adopted a climate and sustainability plan, but we recognize that there is only so much that a city or individual can do — our work must be complemented by statewide action.

Climate change is no longer an abstract concept that might impact future generations. Scientists clearly link climate change to devastating fires that have already led to loss of life, homelessness, and that continue to interfere with tourism, forestry, agriculture and more. Heat waves this year killed unsuspecting people around the state. It is deadly serious, and our actions must be strong to head off catastrophic change in the future.

With that in mind, we strongly support the Climate Protection Program. There are things we like about the draft rule, and components that should be strengthened.

We like

- Overall, this is the first comprehensive climate change program in Oregon. We salute the state for the imagination, courage, and strategic thinking demonstrated by state leaders in creating this effort.
- DEQ's proposal requires natural gas companies to reduce greenhouse gas pollution for the first time in Oregon. This is critical, and a good first step.
- DEQ's proposal requires an increasing number of oil companies to join the program each year. This is necessary, and we support it.

We are cautious about

- Community Climate Investments (CCI): There is a value in providing alternative means to reach climate goals. However, community projects may fail to reduce actual greenhouse gasses. We urge the DEQ to limit these alternatives to 10% or less of the program, provide stricter definitions of what projects can qualify, and require significant oversight to ensure that goals are met. We support a requirement that DEQ review the CCI program at least every two years and terminate any arrangements that don't live up to their GHG reduction targets.

We believe that these areas need to be strengthened,

- Increase the cap: Given the danger and expense imposed by global warming, we must follow the science. The current suggested cap doesn't even follow the goals that were set in 2007, and climate change is coming faster than was expected then. The cap must be raised to at least 50% emissions reduction by 2030, and at least 90% for 2050.

- Include industrial polluters: The current program, based on best available emission reduction (BAER) for major emitters appears to be based on self-disclosure and voluntary compliance. With climate change causing death and economic havoc around Oregon, that simply doesn't work, and without a stronger approach we won't meet necessary GHG reduction targets. We recognize that these firms provide important products and jobs in Oregon, and we approve of a plan that seeks information from the companies themselves. It is possible that because each manufacturing operation is unique, we will need customized targets and compliance. Large emitters should be required to reduce their pollution as much as is feasible, and this should be verified by an independent third party and based on best practices.
- As mentioned above, the CCIs can provide a useful alternative for companies to comply with goals. As an equity measure, we would like to see added language that directs some CCI dollars to communities that are most harmed by fossil fuels: rural communities, low-income communities, and communities of color.

We thank you for your attention to the comments and applaud you for your work. The DEQ bears an enormous responsibility, and we appreciate your service to our citizens and to our future.

All the best,

The Lake Oswego Sustainability Network Board of Directors

Lisa Adatto

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