

Comments to OTC for meeting on October 22, 2020

Re: funding for the Statewide Transportation Improvement Program (STIP) for 2024-2027.

Dear Chairman Van Brocklin and Commission members,

Now is the time for the Oregon Transportation Commission (OTC) to lead on climate and invest boldly and differently to make up for lost time. In August of 2007, the Oregon legislature passed climate goals to reduce greenhouse gas (GHG) emissions and adapt to climate-induced. Yet the subsequent STIP programs covering projects built from 2012 to 2024 woefully lacked climate-focused projects. The Oregon Department of Transportation (ODOT) and former OTCs put climate-focused projects on pause, but as the labor day climate fires have made all too real, the climate crisis overtook us.

We need to significantly reduce GHG emissions in 15 years. By placing climate-focused projects on pause, we are now in the big climate-funding *squeeze*. We need to do more in less time; make up for lost time. Therefore, funding for the next STIP needs to be *supercharged* with funding for climate-focused projects (80% or more of all the projects). Below are the considerations that will enable the OTC to lead on climate by equitably reducing GHG emissions and enhancing adaptation to the climate-induced impacts such as damages to our highways from fires and flooding.

1. Stop funding the expansion of the 20th century transportation system  
(Enhance Projects)

Clear the air about the out-dated presumption that building more roads and lanes reduces congestion. It does not. There is scientific consensus that "... the dominant twentieth century paradigm of solving transportation congestion problems by building more freeways failed." Why are cities removing their freeways? A systematic review of the literature. So, there is no factual justification to continue funding building projects that do not work. Moreover, OTC and ODOT should interpret ODOT's survey results and community input supporting "reducing traffic congestion" to mean support for funding non-highway projects. And, we need to catch up on climate.

2. Fund Non-highway Projects that have a climate and equity focus

An efficient system moves people and goods, not vehicles. To fully implement the Every Mile Counts program Fund Non-Highway projects instead of road building projects. Make it easier for all of us to get around our communities. Expand transit to more rural communities.

3. Prioritize Fix-it and Safety Projects that have a climate and equity focus

Road maintenance and projects focused on transit, biking and walking not only better meet climate and equity goals, they relieve congestion. Replacing culverts and other safety projects in areas prone to fires and floods help us adapt to climate. These also provide more jobs per dollar than road-building because the money is spent on the workers, and we need jobs! Clarify

in clear policy that projects in these two funding categories “buckets” need to focus on reducing GHG emissions and climate adaptation.

4. Prioritize Local Projects that have a climate equity focus

By late 2023, most of the Metropolitan Planning Organizations will have completed scenario plans for reducing GHG emissions. By late 2023, many local governments will have climate plans. Clarify through clear policy that OTC and ODOT will prioritize climate projects under this STIP.

Respectfully,

Helen Kennedy  
Marcola, Oregon



## OREGON CHAPTER SIERRA CLUB

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Oregon Global Warming Commission  
550 Capitol St. NE  
Salem, OR 97301

RE: The future of natural gas and electrification in a low carbon economy

Dear Commissioners,

On behalf of the 80,000 members and supporters of Sierra Club in Oregon, I am writing to express our deep concern in the strongest possible terms about the continued inclusion of fracked gas (methane) as a so-called 'clean fuel' and a 'climate solution.'

Scientifically, in terms of global warming, this is completely bogus, as methane is a potent greenhouse gas.

Because methane is a tiny energetic molecule, methane leakage occurs at every point in the supply chain: from drilling and well management, through processing and distribution, to consumption. The dramatic short- and long-term climate impact of methane as a greenhouse gas more than counterbalances the relatively minor reduction in carbon dioxide emissions in methane combustion compared to the burning of other fossil fuels. Methane is catastrophically destructive to the climate.

To be fair, we did not always know this. There was a moment when people working to mitigate global warming legitimately believed that methane could serve as a transition fuel. We can assume that many of those promoting this concept were sincerely motivated by the crude comparison of direct carbon dioxide emissions from methane combustion, as compared to combustion of coal or oil.

But that is no longer true. No one can now legitimately claim that methane combustion is an improvement over other fossil fuels unless they are truly ignorant of climate science. As Sierra Club Executive Director Mike Brune has pointed out, fracked gas "is not a bridge: it's a gangplank."

It is past time for the Oregon Global Warming Commission to face the scientific reality and recognize the simple truth: there is no fossil fuel solution to the fossil fuel crisis. The climate crisis cannot be mitigated without complete transition away from the use of fossil fuels, as urgently as possible.

Oregon law needs to be updated to reflect this clear, incontrovertible scientific reality, in the upcoming regular session of the legislature. To continue down the misguided path of claiming methane as a so-called "clean fuel" is a form of climate hypocrisy. No legitimate Oregon leader should be making that claim any longer.

Sincerely,

Gregory P. Monahan. PhD (He/Him)  
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*The League of Women Voters of Oregon is a 100-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.*

October 27, 2020

To: Catherine MacDonald, Chair, Oregon Global Warming Commission  
Members of the Commission  
[Oregon.GWC@oregon.gov](mailto:Oregon.GWC@oregon.gov); [info@keeporegoncool.org](mailto:info@keeporegoncool.org)

Re: [Draft 2020 OGWC Biennial Report to the Legislature](#) - Comments on the Report and Agency Implementation

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 science and that will ensure a stable climate system for future generations. Oregon's Climate/Carbon policies must reflect a trajectory consistent with reducing global atmospheric carbon dioxide to below 350 parts per million by the year 2100.

Thank you for the opportunity to comment on the OGWC Draft Report. We appreciate the level of detail and analysis that has gone into the review of agency implementation plans for Governor Brown's Executive Order 20-04 in this draft. Our comments are arranged to reflect the sections of the Report to which they respond. We ask that you consider amending the draft report to reflect these concerns.

#### **Summary/Funding:**

**The League agrees with your report that reflects your recommendation for full funding of the Governor's Executive Order 20-04:** *"In this biennial report, the OGWC strongly recommends that the Legislature fully fund the needed rulemaking and agency work plans called for in EO 20-04 and we highlight 31 additional actions that should be taken to help Oregon get back on track toward our climate mitigation goals."*; especially, the Recommendations: 4) ***Protect funding that the agencies need to advance the directives in EO 20-04.*** And 5) ***Increase funding for the OGWC to expand staff and analytic capacity.***

#### **Serving Impacted Communities:**

We recommend recognizing farmworkers among those exposed to health hazards brought on by climate change.

**We support Recommendations 1 and 2.** We recommend this addition:

Recommendation 3: Vulnerable community members do not have lobbyists with extensive experience influencing legislative and agency decision-making. We recommend that the composition of the Rulemaking Advisory Committees for all agency programs have an over representation of historically underrepresented communities in order for their perspectives to have weight in the discussions and program design adoption.

#### **Governance, Transparency, Accountability and Resources:**

We advocate for easily located "Executive Order 20-04 Climate Implementation" information on the main webpage of all involved agencies, commissions and task forces, with links to relevant upcoming and past meetings, materials, and programs. In documents detailing planning and program development, we

advocate that agencies include a sidebar that identifies how the program prioritizes climate mitigation and how it will benefit Environmental Justice (EJ) and other vulnerable communities.

We support Recommendation 5, and would like to see it expanded:

The Biennial Report reflects important considerations in going forward with program development. The resources and time to provide climate information to Oregonians have been missing from previous efforts to pass climate legislation. In addition, we have not highlighted the solutions embedded in the programs. We must explore diverse ways of reaching out to hear concerns and to discuss the critical nature of our shared emergency. It is important that trusted community members are involved in presenting options for participating in the solutions.

Some examples to include: where, how and for what kinds of jobs will training occur; how farming practices can evolve to improve soil moisture and sequestration and reduce fertilizer use; how the program can be designed to provide financial incentives or rebates to upgrade for lower- or zero-emission equipment; how transit can be sited and developed in all metro areas; where public EV charging infrastructure can be located in all communities, etc. Granges, local teachers, OSU extension agents, Sea Grant fellows, community colleges, farm bureaus, places of worship, and community centers of all sorts must be enlisted in this effort.

### **Regulating Reductions in Greenhouse Gas Emissions:**

We agree with Recommendation 9 that DEQ should develop a robust Cap and Reduce program that will have broad coverage within the covered sectors and a stringent cap that lowers quickly. **The program should rapidly reduce emissions on a pathway to reach net-zero by 2050.** The DEQ workshop on stringency discussed the setting and rate of reduction of the cap.

We believe the penalty for non-compliance should be specified in the Recommendation to be a critical component to ensure a stringent cap. Penalties must be well-defined and implemented consistently and quickly. **The cost of non-compliance must exceed the cost of compliance.** If a regulated entity considers the penalty to be an acceptable cost of business-as-usual, there will be no incentive to achieve the mandated emissions reductions.

We recognize that some flexibility should be provided for early modifications that will take some time to implement. However, the program must ensure that this flexibility not be used as an escape hatch for the regulated entity to avoid making feasible reductions. Whenever possible, flexibility options should be associated with decreasing the negative effects of climate change, the health impacts of co-pollutants, and the costs of the program for communities that are the least able to make accommodations.

### **Transportation:**

Recommendation 18: We support an expansion of the populations with priority to receive training to include persons displaced by workplace contraction or transitions due to climate program adoptions.

Recommendation 19: We support the addition of metrics to evaluate whether application of the “GHG lens” results in a departure from business-as-usual. Does the STIP developing for 2024-2027 have significant investment in emissions-reduction priorities?

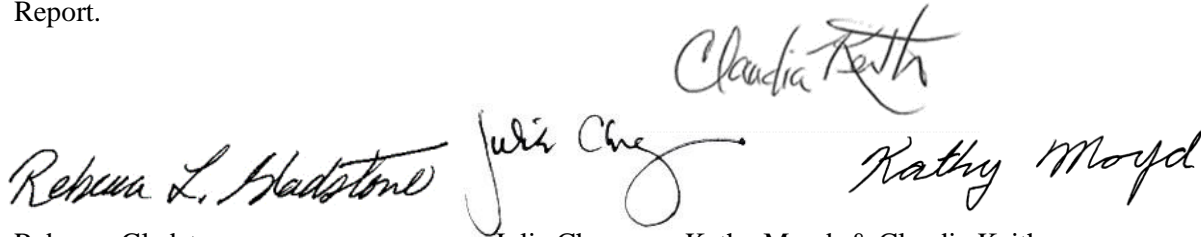
### **Natural and Working Lands:**

The principles and scope of work are well organized, well thought out and researched. The benefits for nature-based solutions to significantly reduce legacy carbon and also bring about significant co-benefits are well drawn. The use of the word “inventory” was not clear to a lay audience, and it would be helpful

to have that term defined: “listing and giving the amounts of greenhouse gas emissions from a particular source” (if that is accurate).

Recommendation 30: It is not clear exactly how soil health data will be used to "assist with goal setting." Soil health data can include a variety of measurements but the values depend on the past management practices and can be very variable. An example of such a database: <https://data.nal.usda.gov/dataset/data-database-global-soil-health-assessment>

Thank you for the opportunity to provide comments for the Draft Oregon Global Warming 2020 Biennial Report.



Rebecca L. Gladstone  
LWVOR President

Julie Chapman, Kathy Moyd, & Claudia Keith  
LWVOR Climate Emergency Portfolio

Cc:

Governor Kate Brown; Nik Blosser, Chief of Staff ([Nik.Blosser@oregon.gov](mailto:Nik.Blosser@oregon.gov)); Gina Zejdlik, Deputy Chief of Staff ([gina.zejdlik@oregon.gov](mailto:gina.zejdlik@oregon.gov)); Oregon Senate President Peter Courtney ([sen.petercourtney@oregonlegislature.gov](mailto:sen.petercourtney@oregonlegislature.gov)); Oregon House Speaker Tina Kotek ([rep.tinakotek@oregonlegislature.gov](mailto:rep.tinakotek@oregonlegislature.gov)); Richard Whitman, Director, Dept. of Environmental Quality ([Richard.whitman@state.or.us](mailto:Richard.whitman@state.or.us))

October 18, 2020

Catherine Macdonald  
Oregon Global Warming Commission  
550 Capitol St NE  
Salem, OR 97301

Chair Macdonald and Commission Members,

Thank you for your efforts to implement Executive Order 20-04 (EO) and propose goals for carbon storage and climate adaptation in Oregon's natural and working lands. We have reviewed the Global Warming Commission (GWC) July 10, 2020 memorandum and further instruction from the Governor to the Department of Forestry (ODF) on July 20, 2020. We are writing to share our specific recommendations to the GWC for a meaningful public process for and adoption of state goals as outlined in the EO.

**Develop Transparent, Inclusive Public Process.** The GWC should initiate with ODF and the Governor a transparent, inclusive, and meaningful public process to implement the EO. An inclusive process **ensures equal representation by diverse perspectives in forest management, forest conservation, frontline and environmental justice communities, and forest carbon experts.** We further recommend that GWC and ODF create a public process to allow public comment and input in response to ODF's revised Agency Implementation Plan report to the Governor. ODF should be expected to create good faith opportunities to welcome public input as other agencies have done. A process for public input should include a Rulemaking Advisory Committee should be formed that includes voices from Tribes, conservation groups, small landowners and rural communities impacted by timber harvest practices, carbon scientists, and forest and aquatic ecologists.

**Create Specific Benchmarks and Policies.** The GWC and ODF need to **create specific benchmarks that support climate smart planning for the purpose of advancing the EO.** The charge is to recommend specific changes in forest practices, state law, and administrative rules that can capture and store carbon, reduce GHG emissions by the forestry sector and ensure forest resiliency in the face of a changing climate. Other states have incorporated natural and working lands into their broader climate change goals, as well as highlighted the importance of climate change in forest management through specific benchmarks and policies. The California Air Resources Board (CARB)'s [draft Natural and Working Lands Implementation Plan](#) identifies specific acreage goals for improved forest health and reduced wildfire severity and enhanced carbon storage in forested ecosystems. Further, ODF can draw upon [California's Forest Offset Protocol](#) for climate-smart forestry criteria to ensure forest management is consistent with state carbon sequestration and climate change adaptation goals. While we are not referencing this protocol to advocate for forest offsets, it is a useful example of the types of actions that qualify as climate-smart, such as high native species compositions, limits on even-aged management, and standing and down dead wood requirements. ODF staff should demonstrate how they are researching, vetting and bringing in criteria from other states' climate smart forestry work.



**Establish a Credible Baseline.** The GWC and ODF need to establish a forest carbon baseline that accounts for the amount of carbon that can be stored and sequestered in Oregon's natural and working lands, including live and dead trees, soils, downed wood, and harvested wood products. This baseline should also consider the carbon storage capacity of the landscape prior to industrial logging, rather than a baseline of the current, often severely degraded state of forests. Private industrial and state managed forests have been subjected to repeated clearcutting and aerial pesticide spraying.

**Ensure Additionality in Proposals.** The GWC and ODF should develop a plan to ensure additionality in policy proposals and forest practices. In order to meet the goals of the EO, employing existing Oregon Forest Practices (OFP) is not helpful to advance meaningful climate goals. **Any laws, rules, or incentives responding to the EO must be in addition to the existing regulatory framework for logging in Oregon.** Oregon should aim to go beyond the status quo carbon sequestration by its forests towards the goal of restoring forests' natural carbon richness and biodiversity to be consistent with climate resilience, while employing people in sustainable forest-related jobs.

**Integrate Practices That Store Carbon.** Robust riparian buffers, longer harvest rotations, retention of more trees and a diversity of species, and conserving natural forest structures must be enshrined in policy to meet the goals of the EO. **The GWC and ODF should incorporate other policies and agency goals that can work in tandem with the goals of the EO.** Examples include the legislated agreement to establish a new statewide Habitat Conservation Plan for aquatic species, the Oregon Watershed Enhancement Board's 100 Year Water Vision, DLCD's 2020 Oregon Climate Change Adaptation Framework and ODFW's Climate and Ocean Change Policy.

**Take an All of the Above Approach.** To achieve the carbon storage and forest resiliency goals of the EO, **we need to use all of the tools in the toolbox including tax incentives, regulatory measures to expand carbon storage, and GHG reductions in forestry practices.** We need to identify tax structures and market forces to encourage climate-smart forestry practices and work with ODF to identify and advance new mechanisms to achieve these practices. By modifying economic structures, ODF can achieve outcomes to reduce GHG emissions and store carbon.

**Support and Incentivize Existing Certification Programs Used in the Pacific Northwest.** Broader adoption of forest Stewardship Council (FSC) certification could serve as a strong baseline for climate friendly forestry in Oregon, and tax structures and regulatory structures should encourage these standards.

Thank you for your work to address the urgent need to take meaningful action to address climate change. Oregon is in a unique position to achieve success, with some of the largest forest carbon stores on the planet located in our state. We look forward to working with you as the Global Warming Commission continues to provide scientific expertise, policy guidance, and

public education to support strong action to address climate change by the Oregon State Government.

Sincerely,

Joseph Vaile, Climate Director  
**KS Wild**

Lisa Arkin, Executive Director  
**Beyond Toxics**

Aiyana Bodi, Policy Associate  
**The Pacific Forest Trust**

Steve Pedery, Conservation Director  
**Oregon Wild**

Comment to OGWC Members at October 30 Commission meeting

Please provide this comment to OGWC Members re role of natural gas in Oregon's energy and emissions policy picture:

OGWC Members: As you are listening to the natural gas testimony at your meeting on October 30 I would ask you to bear in mind the ideas in the paragraph below.

While natural gas has helped to back out coal-to-electricity generation and emissions nationwide, increasing amounts of gas are being directly burned in Oregon for space and water heating in homes and small businesses. Oregon's GHG emissions from residential and small business natural gas were 66% higher in 2016 than in 1990. The gas utilities may argue that their product is cleaner than electricity from burning dirty coal but the fact is that the electric utilities are cleaning up their act (with a little prodding) and their emissions have declined. Gas speaks aloud its decarbonizing aspirations but the proofs are distant still. Deferring to gas utility assertions in the near term should be contingent on these utilities being held accountable for achieving decarbonization in the intermediate and long term comparable to our expectations of the electric utilities.

OGWC 2018 Report to the Legislature, pp. 78-79; Emissions from Residential plus Commercial Natural Gas Combustion 1990 to 2016

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Sent via form submission from [Keep Oregon Cool](#)

**Name:** Sue Craig

**Email Address:** [sueacraig@gmail.com](mailto:sueacraig@gmail.com)

**Subject:** Sequestration of carbon by our old growth trees.

**Message:** I am concerned that so many of our Advisory Commissions, seem to have such a narrow focus. This is a time when we need to be thinking in really connected ways on how to decrease our carbon footprint. And we need to be considering many ways to allow our forests, and public lands help in that process.

The emphasis of the Oregon State University seems mainly to push "How many Board Feet" that our forests can produce...plus all the wood products. How about thinking of other types of trees,...like bamboo, or grasses, or hemp that can provide materials that our Douglass Fir plantations are now providing. Just trying to think outside the box. We need to be doing that NOW.

Sent via form submission from [Keep Oregon Cool](#)

**Name:** Paul Rodriguez

**Email Address:** [awizard@aol.com](mailto:awizard@aol.com)

**Subject:** CO2 Emissions

**Message:** Good Day -

As part of the State's CO2 emissions processes, the phasing out of natural gas as a home heating fuel and transportation fuel MUST be incorporated.

Thank you.

## Comments on the Draft 2020 Oregon Global Warming Commission Biennial Report

The Oregon Global Warming Commission's draft 2020 Biennial Report notes that Executive Order 20-04 directs all state agencies to consider and integrate climate change, climate change impacts, and the state's greenhouse gas (GHG) emissions reduction goals into their planning, budgeting, investment, and policy-making decisions. The draft report also identifies the Social Cost of Carbon (SCC), as a tool specifically designed for this purposes. The SCC is a metric that reflects the future damage to society caused by emitting carbon dioxide and other GHGs today. The SCC calculation of these damages is used as a proxy for the value of avoiding those future damages. Several methodologies exist for estimating the SCC, but all involve the devaluation of future costs using a discount rate. Discount rates are appropriately used in cash-flow analysis of alternative investment opportunities. However, with regard to valuing societal costs of climate change damages, using a discount rate has two significant flaws.

First, from the perspective of a bank or an investor with many different investment opportunities, a discount rate reflects the minimum expectation on future earnings based on expected growth in the economy and some baseline investment opportunity. The methodology allows consistent quantitative comparison of alternative opportunities, but it assumes a continuously growing economy with multiple options available. Unfortunately, we are in a climate emergency, as the draft report notes, and we face limited options in a constrained environment. Second, in the typical use of discounting, the investor and the recipient of the impacts are the same person or entity. However, climate impacts occur over generations and our children and grandchildren are the unwitting recipients of the damages we are creating.

Most SCC methodologies do not use bank discount rates, recognizing that much lower rates are appropriate for societal valuations. However, when benefits and costs are intergenerational, any discount rate above zero means that society benefits from lower costs today, but our children, grandchildren and future generations must pay higher costs tomorrow.

Consider the perspective of a future generation that must suffer the damages from our actions today. How would they discount the value of the good to us today, which causes them damages? Would they not apply an offsetting discount rate to our present good, based on the future harm they suffer? Therefore, if we care (as a society) about the harm we are inflicting on future generations, it suggests we should be applying a negative discount rate to our discretionary actions that result in unavoidable damages to future generations.

Consider that the costs to us today of transitioning to clean energy, clean buildings and clean transport, these costs are incremental to our current business trends, and will create new industries that will generate good-paying jobs and economic developments. Trends are already underway in all these areas, but they need to be incentivized and rapidly scaled-up.

Then consider that we are already seeing the significant costs that climate damages can inflict, and these will only get worse the longer we delay action. This loss of life and destruction of infrastructure and natural resources is neither incremental or avoidable, which justifies using a negative discount rate when comparing current clean energy transition costs to the cost of the damages they would avoid.

Using a discount rate greater than zero devalues future costs and favors industry, by effectively giving more weight to today's cost impacts, and results in a dramatic shift of the future costs to all Oregonians, and particularly those already suffering disproportionately from climate change and the environmental pollution from fossil fuels. Ultimately, all Oregonians will suffer increasing damages from more deadly wildfires, more extreme weather, ocean acidification, heat related deaths, expanding tropical diseases, and more droughts and floods. Furthermore, from an economic perspective we would likely see current trends continue, meaning shrinking jobs in rural & coastal areas, low levels of innovation, high levels of localized pollution, and continuing systems of exploitation, inequality and injustice.

Using a discount rate of zero would place more weight to the cost impacts to all Oregonians and especially to those most impacted by climate change, and would alleviate significant costs for all Oregonians and will generate jobs and economic development from transitioning to clean energy. Transitioning to 100% renewable electricity will create thousands of jobs manufacturing, installing and servicing solar and wind based power plants. Transitioning to electric and clean vehicles of all types will create jobs and economic opportunity for manufacturing, selling and servicing these vehicles of all types. Transitioning our buildings to clean appliances for space and water heating will create jobs manufacturing and installing these new devices along with other jobs for efficiency retrofits to the building envelope.

In addition to the discounting rate, another major factor in the SCC calculation is the level of damage estimates used. Average damage estimates do not account for the variability in weather and other climate-related events that occur around that average, which actually create greater damages, and justify using a 75<sup>th</sup> or higher percentile damage estimates.

I urge the OGWC to research and recognize these facts in its report and urge that SCC calculations use a discount rate no greater than zero.

Dr. Pat DeLaquil

Please add this report to the public record for tomorrow's meeting: Rhetoric vs. Reality: The Myth of "Renewable Natural Gas" for Building Decarbonization

This report will give the Commissioners and interested public a scientifically based, balanced view of the issue of "Renewable Natural Gas."

I realize this submission is too late to be included in the Commissioners packet for tomorrow's meeting but would like the information contained in it to be part of any decision making process on this issue.

Thank you for your good work in leading Oregon towards a better future.

Gregory

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