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Robin MacArthur, Chair
LCDC
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Re: Re EO 20-4 - Additional Comments for DLCD June 11 Forum and also
for 4-Agency Work Plan

Dear Robin:

I am most pleased with the Goals review for climate change adaptation, mitigation, and sequestration project and the fall forums. Given the report on expected revenues, it will be very important, it seems to me, to obtain buy-in and revenue from the Governor and her budgeteers. I hope DLCD staff, the Commission, the planners, the environmental community and others will join in enthusiastic support. Money shortages and equity considerations are essential parameters but should not thwart the proposed Goals update. As to revenue shortages, in addition to State general fund revenues, I think DLCD should seek federal and non-profit grants to supplement 2021-23 efforts on goals modifications to address climate change.

Adaptation to climate change program needs to include recommended Goal changes. The DLCD 2010 Adaptation Framework of mere risks should not be repeated. I am concerned that much time, money and staff resources will be spent in background, coordination and suggestions, and little will be spent in drafting language to make specific changes in the goals. Persons with low incomes and those of color are frequently relegated to living on marginal lands that are threatened with increasingly significant catastrophic events. There should be specific adaptation requirements in the land use decision making process emanating from proposed goal changes. Examples should include: use of the 500 year flood plain rather than the 100 year because of sea level rise and rapid run-off; a land use requirement for no replacements from losses caused by catastrophic storm events; enhanced shoreland sloughing requirements; viable procedures for modifying the 16 foot Beach Bill line; use of the tsunami zone and DOGAMI consultation as part of the approval process; a rolling easements process. The adaptation process must address not only land decisions, but also adaptation to global warming caused ocean changes under the umbrella of Goal 19.

Revise EMC to include changes to LCDC Goal 12. The “Every Mile Counts” work plan should be revised to include suggested Goal 12 changes in response to global warming issues, with numeric targets for such goal changes based on how much CO₂e is reduced as compared to

the 80% target of the Governor. One example is a Goal 12 change requiring the identification of and support for locations where low income and the homeless, as well as underserved communities or different ethnic groups reside or will reside by 2050, and assurance that public electric transportation and non-motorized access are and will be readily available. For another example, what Goal 12 changes are needed to show progress toward meeting a projected cut in transportation generated GHG from electric trucks and cars as meeting the 80% reduction goal of 4.2 KMT emissions?

Make Sequestration goal draft due October 2020. Regarding the resource agencies' sequestration effort. I applaud OGWC, DLCD, ODOT and DOE for taking on the role of developing a state statutory sequestration/carbon capture goal for Oregon. Those with low incomes and the homeless will suffer growing health effects from global warming and more forest fires in Oregon. In addressing these effects, it is disappointing that the deadline for a report on a proposed statutory sequestration goal is not due until June of 2021. The Goal should be September or October of 2020, in order to provide an action opportunity to the 2021 legislature. Oregon should bear its fair share of a world-wide sequestration effort (eg, if the world wide need for CO2e removal is 1000 gt, and the USA is responsible for placing 25% of it in the atmospheric sink, and Oregon is 1.4% by population then that should be its share). Oregon has one of the best carbon capture capabilities in the world with all of its forests, public and private. It is important to address sequestration possibilities within Oregon's 3 mile jurisdictional limit under Goal 19. An adequate share of responsibility should be increased to recognize Oregon's plethora of opportunities for forest sequestration. OCCRI should be asked to provide a report on Oregon Sequestration/ carbon capture potential by September.

Use Local Plans. DLCD should also undertake to measure anticipated impacts from existing local government climate change plans and show quantitatively their contribution to meeting the 80% CO2e reduction goal ordered by Governor Brown. I offer some additional ideas at: https://pdfs.semanticscholar.org/72f4/0d2e634be8bdfa4df224652c883d7424eeef.pdf?_ga=2.232938142.143344516.1591649332-135587921

Yours very truly,

Steve Schell

Cc Jim Rue, Kirsten Greene, Palmer Mason, Kristen Sheerin, Angus Duncan, Rep. Ken Helm, Bob Van Brocklin