

## **Comment on the Oregon Department of Environmental Quality's Draft Climate Protection Program**

*→How-To & Talking Points*

Want to send DEQ a comment on the draft Climate Protection Program rules but need some help? Follow these steps!

1. **Craft your message:**
  - a. Consider the talking points outlined below on four critical topics that are either missing from or too weak in the current draft rules.
  - b. To help create your message, copy and paste a few main points from below into an email message.
  - c. Add your own comments and concerns to express to DEQ what you're most passionate about!
2. **Include:** "Rulemaking Comment" in your subject line
3. **Email your comments to:** [GHGCR2021@deq.state.or.us](mailto:GHGCR2021@deq.state.or.us)
4. **Submit your comments by the deadline:** October 4th at 4 p.m. (PST)

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Dear Dept. of Environmental Quality Office of Greenhouse Gas Programs,

Oregon's Climate Protection Program is a critical opportunity to set Oregon on the right path to reducing the effects of climate change in our state and nationwide. The rules will make a real difference in the lives of Oregonians. I believe there are four areas in which the draft rules can be stronger. The Climate Protection Program must:

- Hold industrial polluters accountable
- Protect vulnerable communities
- Verify the value & benefit of offsets
- Include carbon sequestration programs

**1. The Climate Protection Program must hold *all* large polluters accountable.**

- The cap in the draft rules does not reduce pollution fast enough. The state legislature and Governor Brown have already committed to science-based, economy-wide

targets. DEQ needs to follow the science with quantifiable, enforceable results. Specifically, I want to see a cap that will cut 50% of climate pollution from covered sources by 2030 and at least 90% by 2050.

- The cap should cover stationary sources. Allowing major industrial polluters to “self-identify” and create their own plans to reduce emissions is a recipe for disaster.
- The rules should include Oregon’s biggest big polluters: fracked gas power plants. By entirely exempting fossil fuel electric power generators, DEQ creates a huge loophole that locks in the burden of pollution that communities near fracked gas power plants already have to endure. How can DEQ expect to effectively address the climate crisis while giving our biggest climate polluters a free pass?

## **2. The Climate Protection Program must protect the communities that bear the burden of pollution.**

- Communities of color, rural communities and low-income Oregonians are disproportionately affected by pollution and the climate crisis.
- The rules place the burden of greenhouse gas emissions, and their co-pollutants like smog-forming and cancer-causing VOCs on BIPOC and other marginalized communities.
- Environmental justice should be Oregon DEQ’s top priority in designing this program, not the desire of climate polluters to avoid costs and inefficiencies for their industry.
- Right now, the rules include lip service about equity but no data collection, equity mapping, tracking or enforcement to ensure the benefits reach impacted communities. So how will we know if the rules help or hurt?
- We can’t depend on emitters to value public health over their bottom lines – we need our regulators to do their jobs to protect our health and environment. We demand transparency and accountability.

## **3. The Climate Protection Program must verify the value and benefit of offsets.**

- If DEQ is going to include offsets in its climate strategy, it must commit to verifying that they’ll have positive outcomes for the climate and frontline communities. Right now, there’s too much leeway for polluters to choose how and when and where they take accountability for their emissions.
- As the rules are currently written, polluters can keep polluting the communities around them instead of meeting climate pollution reduction limits.

- With input from the Equity Advisory Committee, DEQ should select which approved Community Climate Investment (CCI) projects get funded in what order and in what amount, rather than leaving that decision up to the regulated entities buying CCI credits. Both the Equity Advisory Committee and community-based nonprofits executing the projects should receive financial support and technical assistance.
- The CPP should guarantee that each CCI credit eliminates one ton of climate pollution and ensure that an exact percentage of CCI projects will benefit those on the frontlines of harm from climate damage, such as low-income, rural, Tribal, and BIPOC communities. Polluters must not be able to purchase or bank these credits indefinitely.

**4. DEQ should consider carbon sequestration in addition to greenhouse gas emission reductions.**

- Rapid, meaningful investments in both emissions reductions *and* carbon sequestration and storage are necessary to achieve the climate and community outcomes we seek.
- DEQ should require that community climate investment (CCI) projects include the option for carbon sequestration, preferably in rural Oregon, and follow the best practices of being real, measurable, additional, persistent, verifiable, and enforceable.
- Investing in carbon sequestration and storage projects in rural communities can support climate outcomes and bring additional benefits such as job creation, cleaner air, safer drinking water and protecting wildlife habitats.
- There are many types of carbon sequestration projects to explore, including longer tree rotations, regenerative agriculture, wetland preservation and restoration, and more. DEQ should account for the needs of rural Oregonians and recognize the significant value natural climate solutions hold.

It's too late for Oregon to get this wrong. The DEQ must strengthen the Climate Protection Program rules for all Oregonians. Thank you for considering my comments.

Sincerely,  
[Your name]

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