



February 5, 2018

Dear Oregon State Legislators:

We appreciate the opportunity to provide comments on the cap and trade proposals before the 2018 Oregon State Legislature. Westside Economic Alliance, a member organization representing 150 employers, government entities, and elected officials in the Portland-metro area, encourage lawmakers to analyze the cap and trade proposals using the lens of the following set of principles.

Guiding principles:

Climate change is a critical issue of our time. Oregon – its governments, employers, and residents – can be leaders in charting a pathway for a low-carbon future that will help mitigate the impacts of climate change while building a stronger economy, resilient communities, and healthier Oregonians. Policies to reduce greenhouse gas emissions are often complex and nuanced. We must ensure that policies Oregon adopts accomplish real GHG reductions in the most cost-effective and efficient manner in order to protect our employers and families from unnecessary cost impacts.

The overarching, driving goal of any carbon policy should be to reduce greenhouse gas emissions, not raise revenue. With this goal in mind, the Westside Economic Alliance puts forth a set of guiding principles for crafting carbon policies.

Oregon’s carbon policies...

- Effective:** Result in actual reductions to Oregon’s greenhouse gas emissions.
- Efficient:** Are the most cost-effective methods for achieving the most greenhouse gas reductions in each sector of Oregon’s economy.
- Realistic:** Set goals that are technologically and economically feasible, which likely requires adjusting goals and rules for each sector of the economy and the individual covered entities in the sector.
- Flexible:** Are updated or retired based on innovations in technology, changes in state or federal policy, changes in market-circumstances, or other opportunities or issues.
- Targeted:** Take into account and build from existing environmental rules and mandates so they do not add undue cost or increased burden to businesses and employers.
- Tailored:** Recognize different sectors of the economy have unique operations, opportunities and issues that must be taken into account.

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Accountable: Transparently use any funds raised from policies for programs that have a direct impact on reducing GHG emissions, as verified by subject matter experts.

Inclusive: Are crafted with meaningful engagement and in close consultation with businesses that would be regulated by the policies, in addition to other stakeholders.

Fair: Affordable and equitable for all Oregonians and Oregon businesses, including low-income families and rural communities, with no disproportionate impacts to small businesses and large employers and consumers.

We have some concerns that the cap and trade proposals before you do not wholly encompass these practical and important principles, and look forward to working with you on the critical design issues within this program.

We hope to be included as a constructive voice in crafting strong, fair, accountable and effective climate policy.

Sincerely,

Westside Economic Alliance
Board of Directors