



To: Senate Committee on Environment and Natural Resources
House Committee on Energy and Environment
Re: HB 4001 and SB 1507, "Clean Energy Jobs"

Date: February 7, 2018

Now more than ever – in the face of a national rollback of climate-change policy and environmental protections – Oregon must come together to take statewide action for climate policy in 2018. We ask our legislators to please pass a strong and forward-thinking Clean Energy Jobs bill, HB 4001 and SB 1507.

Beyond Toxics works every day to help Oregonians meet a shared moral obligation to not leave a less habitable earth for our children, for their children, and for those of many hundreds of generations to come. A healthy atmosphere is a fundamental human right and the most vulnerable communities need our attention and immediate action. To meet this obligation, the goals laid out in this Clean Energy Jobs bill must be acted upon and respected by all of us, governments, corporations and individuals alike.

For our members, supporting the Clean Energy Jobs bill is joining in a clarion call to governments to transform the climate debate and address the environmental harm and human rights implications of climate change.

Strengths of the Clean Energy Jobs bill include:

- Carbon pollution will have a price that is borne by polluters and not shouldered by the public in the form of illness, drought, floods, heat stress, loss of water quantity and quality and the many other manifestations of climate change.
- Just Transition Fund of 15% to support workforce development, including job creation and training particularly among those most adversely affected by climate change or in need of transition assistance.
- Creation of a 21-person citizen advisory committee with strong representation from the environmental justice and environmental protection sectors.
- Methodology for identifying impacted communities that will include socio-economic, demographic, environmental justice and environmental exposure factors.

Beyond Toxics urges the passage of Clean Energy Jobs, and yet we feel that the Legislature must address needed improvements to the bill in the following ways:

- Lower the threshold for exemptions. The current threshold of 25,000 metric tons of carbon dioxide is too high. We recommend a threshold of 10,000 metric tons of carbon dioxide as a starting place.
- Set standards and award criteria for offsets for conventional industrial timber, industrial agriculture and industrial animal feedlots. Offsets should be awarded only in cases that private timber and agriculture uses are certified to meet the highest standards for climate mitigation and carbon sequestration. The Clean Energy Jobs bill must set forth criteria for offsets, such as the criteria adopted by the Forest Stewardship Council to prevent forest loss,



prevent reduction in tree species and biodiversity, and prevent forest degradation. For example, the practices described by Laurie Wayburn of the Pacific Forest Trust for land stewardship and management to restore forests to “older and more natural conditions” must be a requisite element of Oregon’s climate policies.

- Reduce free pollution allowances from 90% to no more than 25% freely assigned allowances.
- Set strict criteria for proposed Polluter Allowances given to emissions-intensive industries. Establish a “sunset” date to eliminate pollution allowances in the program. Monitor polluters to reduce carbon emissions and ratchet down free pollution allowances on an annual basis.
- Require proof of trade exposure or “leakage” pressure.
- Eliminate exemptions for fluorinated gases, due to their high potency as greenhouse gases.
- Apply a Life Cycle Analysis (LCA) to quantify all the emissions attributable to an economic activity regardless of where they occur.
- Limit offsets to less than 2%.
- Restrict offsets to Oregon-only projects.
- Prohibit offset projects or the use of Climate Investment funds for nuclear power, fossil fuel-generated energy projects, forest biomass energy projects, industrial timber short tree-harvest rotations, and incineration of medical and municipal wastes.

A worthy climate policy includes recognition of the inherent moral worth of all living beings and of the ecosystems out of which they emerge and on which they depend. It follows that a Climate **Justice** agenda that intentionally prioritizes the needs of vulnerable communities and communities of color is an approach future generations will laud. We look forward to partnering with our Legislators and others who share a vision of Oregon’s leadership for a Just Energy Transition to pass this bill and continue to improve upon its rules and implementation.

Sincerely,

A handwritten signature in black ink that reads "Lisa Arkin". The signature is fluid and cursive, with the first name "Lisa" and the last name "Arkin" clearly legible.

Lisa Arkin, Executive Director
Beyond Toxics
1192 Lawrence Street
Eugene, OR 97401