

2019 Oregon Legislative Session
House Bill 2020
Public Hearing: February 15, 2019

Testimony to Joint Committee on Carbon Reduction
Submitted by: American Federation State County and Municipal Employees, AFSCME Local 3336

Co-Chairs Senator Dembrow and Representative Power:

AFSCME Local 3336 represents the public employees who work at the Oregon Department of Environmental Quality. AFSCME supports strong regulatory policies as well as multi-partner collaborative projects that rapidly reduce greenhouse gasses, equitably distribute carbon costs and build resilient communities.

We also support policies with labor agreements that provide safe, living wage jobs, workforce training, opportunities and career advancement for workers of color and women, and investment in Oregon businesses and communities.

Because those are our values, we support several elements of House Bill 2020. We support strengthening greenhouse gas reduction goals; capping, regulating and putting a price on greenhouse gas emissions; investing revenue from a climate action program in most affected communities and a just transition for displaced workers. We have serious reservations, however, about the creation of a new carbon policy agency and we adamantly oppose Sections 46 and 47 - the transfer of DEQ's greenhouse gas inventory records, duties and employees to the Carbon Policy Office or its successor agency. For AFSCME 3336, these two sections of the bill are fatal flaws.

Moving the greenhouse gas inventory program into a new agency will disrupt DEQ's climate policy work and impede staff communication and collaboration. Climate policy infuses the work of dozens of DEQ staff in air, land and water programs. The staff who currently track, review and analyze the greenhouse gas inventory do not work in isolation. These staff interact daily with co-workers developing policy on materials management, product life cycle analysis, a consumption based greenhouse gas inventory, low carbon fuels, transportation planning, electric vehicles, diesel pollution and multi-pollutant air planning.

Artificially separating greenhouse gas reduction from DEQ's other pollution reduction programs that implement the Clean Air Act would be administratively inefficient and potentially harmful to public health. Many sources that emit conventional and toxic air pollutants also emit greenhouse gasses. In fact, greenhouse gas staff and air permitting staff rely on each other to identify gaps and overlaps in their respective programs. Implementing greenhouse gas reduction through DEQ allows for that continued collaboration as well as an efficient and targeted suite of measures to reduce conventional pollutants, air toxics, and greenhouse gas emissions from stationary sources and transportation, including diesel reduction efforts.

DEQ staff also have the regulatory, technical and enforcement expertise to effectively and rapidly implement greenhouse gas reduction policies. AFSCME believes that regulated entities, whether or not they like regulation, appreciate certainty, consistency, and predictability. Technical expertise informs environmental regulation, but long-term relationships and trust in the process allow the regulated and the regulator to work through problems efficiently. Inserting another government agency that regulates pollution into the process will undoubtedly create complications and confusion.

Finally, DEQ staff are experienced rule writers who understand that successful rules are informed by a robust and accessible public process. AFSCME is concerned that a newly formed and staffed agency will lack that expertise and at the same time be pressured to turn out rules rapidly. Inevitably, AFSCME believes, the public input process will be shorted and rules will be harder to implement.

Ultimately the loser in this scenario will be neither industry nor government, but Oregon's current and future communities that expect and deserve to breath healthy air. AFSCME Local 3336 cannot support well-intentioned but poorly executed public policy. For these reasons, we urge the Joint Committee on Carbon Reduction to amend HB 2020, remove the requirement to transfer greenhouse gas inventory employees from DEQ, and reconsider the assignment of environmental regulatory responsibility to a new agency.

Thank you for the opportunity to comment on HB 2020.

Respectfully,

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