

March 25, 2020

To: Chair Byer and Members of the Senate Committee on Environment and Energy

From: Ron Bunch, Policy Advisor on behalf of Oregon Climate Agriculture Network (OrCAN)

RE: Not in Support of the Current Version of SB 541

The Oregon Climate Agricultural Network's (OrCAN) mission is to advance farm-based solutions for climate resilience and to protect and enhance the natural resources that support Oregon agriculture including healthy soils and water resources. OrCAN also strives to support the farmers, ranchers and other workers that are the foundation of agriculture through collaborative, inclusive, producer driven networks, education programs and engagement in policy issues.

OrCAN believes that carbon sequestration on natural and working lands (NWL) can contribute to climate stability and environmental co-benefits such as soil health, forest, agricultural productivity and the health of watersheds and estuaries. However, OrCAN does not support the current version of SB 541 for the following reasons.

The March 23, 2021 testimony to the committee by Erica Fleishman, PhD is to the point that mitigation and reduction of emissions are distinct. They are not interchangeable. Oregon cannot ignore the need to reduce greenhouse gases (GHG) emissions based on the premise that these future emissions can be mitigated away through carbon sequestration on natural and working lands or that there exists an off-setting reservoir of sequestered carbon.

Under current circumstances it is not possible to measure with a degree of certainty how much carbon and other GHG are sequestered, or for that matter can be, on Oregon's NWL. Also, the amount of sequestered carbon can fluctuate due to seasonal circumstances and management practices and some NWL management practices are net contributors to GHG emissions.

In addition to the above difficulty of measuring sequestered carbon there are three other factors that make it difficult to assume NWL carbon sequestration could serve in lieu of emission reduction. For example, for NWL carbon sequestration to be meaningful it must also be additive; that is the amount of carbon sequestered over time must be in addition to what already exists. It must also involve a long-term commitment to permanence. For example, some soils take many years to build up higher levels of sequestered soil carbon, but that can be wiped out in a few seasons of poor management practices. Finally, carbon sequestration must be verifiable which involves making sure NWL are either performing, or being managed, to achieve expected carbon sequestration outcomes.

Finally, the bill as written could upset the potential for future carbon offset markets by locking into place an assumption that somehow the carbon sequestration potential of Oregon's NWL is dedicated by state policy to accomplish the state's emission reduction goals.

In closing this bill arose and was scheduled for hearing very quickly. It has significant policy and practical consequences that need to be further investigated before it is considered for adoption. This requires engaging a wide range of stakeholders which is not possible at this late stage.

Thank you.

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