



TO: Chair Marsh, Vice-Chairs Levy and Levy, and Committee Members

FR: Teryn Yazdani, Staff Attorney & Climate Policy Manager
Lisa Arkin, Executive Director

DT: February 27, 2023

RE: Testimony to the House Committee on Climate, Energy, & Environment in Support of HB 3196

Dear Chair Marsh, Vice-Chairs Levy and Levy, and Committee Members,

On behalf of Beyond Toxics, a state-wide environmental justice nonprofit, and thousands of our supporters across the state, we are writing to express our strong support of HB 3196. Beyond Toxics has been an active public interest participant in policy decisions related to public well-being for over twenty years. We are deeply invested in climate justice and climate policies that promote decarbonization and prioritize environmental justice principles. Beyond Toxics was and still is actively involved in efforts to develop and implement the Climate Protection Plan (CPP) since its inception. We, therefore, support and urge you to pass HB 3196, which will ensure a strong implementation of the CPP for the betterment of Oregon's communities and our climate.

In 2020, Beyond Toxics sat on the CPP's Rulemaking Advisory Committee (RAC). In our capacity as a RAC member, Beyond Toxics reviewed program design elements, modeling designs, rule outlines, draft rules, final modeling results, fiscal impact analyses, and more. Beyond Toxics also wrote and submitted public comments in support of the CPP and attended additional coalition meetings—apart from the RAC—regarding the CPP. In our official capacity, Beyond Toxics championed the CPP, prepared legislative briefings on the issue, and mounted a massive public relations campaign to generate several hundreds of comments in support of the Program leading up to the close of the Rulemaking comment period. Additionally, we are engaged in community advocacy efforts supporting CCI implementation and are part of a diverse coalition of environmental advocates defending the CPP against industry legal challenge.

Implementation of the Community Climate Investments (CCI) Program is an aspect of the CPP of particular importance to Beyond Toxics. The CCI Program allows regulated oil and gas companies to invest in clean energy projects in Oregon communities instead of reducing some of their own climate pollution. This program prioritizes and aims to reduce burdens on environmental justice communities—like those Beyond Toxics serves. It enables an alternative means of compliance with CPP emission reductions for regulated entities that could give frontline communities—including rural communities—access to emissions reduction technology,

clean energy projects, and other climate-focused investments. Our members and the communities we work with stand to benefit directly from the CCI Program as well as from the CPP's broader impact on GHG emissions and air quality.

If adequately implemented and enforced, the CCI program will support job creation, economic vitality, and cleaner, cheaper, healthier energy, and transportation options in environmental justice communities across Oregon while ensuring that our state stays on track to avoid catastrophic climate impacts. However, without adequate oversight and accountability, Oregon will not meet its climate and equity goals; by providing oversight and accountability of the CCI program, HB 3196 will help ensure Oregon stays on track.

Thank you for this opportunity and for your time. **Please support and pass HB 3196 for Oregon's climate and communities.**

Sincerely,

Teryn Yazdani
Staff Attorney & Climate Policy Manager
Beyond Toxics

Lisa Arkin
Executive Director
Beyond Toxics