

Representative Helm and Beth,

I am planning to participate in the CEJ Agriculture, Forests, Fisheries, Rural Communities and Tribes Work Group meeting on Thursday November 2nd remotely and may provide some input by phone during the discussion and/or Public Comment portion of the meeting, but am submitting comments in writing as well.

Here is my input on each of the Policy Questions to be discussed:

Percentage of compliance obligation that can be met with offsets?

SB 1070: 8% cap, allows lower percentage in certain areas.

Proposal:

I recommend keeping the offset limit at 8%, as it currently stands in 1070. Here is some background, provided by [The Climate Trust](#), about why keeping the offset limit at 8% is important:

“Certainty in significant, long-term demand for offsets will mobilize private capital into land-based GHG reduction projects. A reduced offset limit sends a signal of uncertainty to private investors, limiting interest in financing agricultural and forestry GHG reduction. The offset market can motivate agricultural and forestry GHG reductions at a faster pace and greater scale than auction fund reinvestment because it sends a long-term price signal that can be depended upon, makes payments for verified reductions rather than anticipated reductions, and focuses on the most cost-effective reduction opportunities. (For more information about this, see The Climate Trust’s brief [How the offset market mobilizes investment in emission reductions today](#), in which they discuss why the offset market leverages more private finance than the programs they have seen from California’s Greenhouse Gas Reduction Fund.) Reinvestment of auction revenue is essential (especially for very small or difficult to quantify projects), but the strong demand for offsets created by an 8% limit is key to leverage private finance to achieve the emission reductions we need from agriculture and forestry.”

Restrictions on offset project location?

SB 1070: Be located in the United States or a country with which EQC has entered an agreement for administering a carbon pollution market

Proposal:

It seems like there is value in limiting projects to Oregon so that Oregonians can benefit from offset funding, but I am not fully aware of the consequences of limiting the program this way.

Should aggregation be allowed?

SB 1070: Not addressed

Proposal:

Yes. So that small farms and forest owners can participate.

Principles that govern protocol development?

SB 1070: Not addressed

Proposal:

Include agricultural practices proven to mitigate climate change through carbon (or equivalent GHG) capture or sequestration, which are applicable to Oregon and farming practices currently implemented in Oregon.

Role of ODA and ODF in protocol development?

SB 1070: Not addressed

Proposal:

ODA could facilitate the process of receiving stakeholder input in order to develop protocols. If ODA is in this role, small and organic farms need to be fully engaged in the process.

Other comments:

Offsets may not be the most efficient way to engage Oregon agriculture in mitigating climate change through this policy.

It may be more effective to provide funding from reinvestment revenue for GHG mitigation by the agriculture sector. Consider establishing an additional Fund, similar to California's Healthy Soils Program, which would provide grant or other funding to the agriculture sector for projects which mitigate greenhouse gas emissions. These grant funds could leverage existing state or federal grants. For example, ODA could seek a federal grant through existing programs and use the state funding (Cap and Invest reinvestment revenue) as matching funds, to distribute funding to farms in Oregon.

Thank you for your consideration of these comments.

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