The Climate Reality Project®

PORTLAND CHAPTER

Dear Chair Lively, Vice-Chair Gamba, Vice-Chair B. Levy, and Members of the House Committee on Climate, Energy, and Environment,

I am writing on behalf of the Climate Reality Project Portland Chapter in opposition to HB 3261, which creates a task force with an explicit purpose to "study incentives for increasing the availability of renewable diesel." We believe this is inadvisable, as incentivizing renewable diesel reduces funds available for incentives for the more efficient, climate friendly, and in the long-term more affordable transition to electric vehicles.[1]

Renewable diesel is neither a clean nor sustainable energy source at scale. It emits harmful pollution both in production and in combustion, and the feedstocks to produce these fuels do not grow back at a reasonable time scale to be considered renewable. Climate Reality Project Portland members urge you to keep the focus on truly renewable energy, and look to solutions like Seattle's transition to a battery-electric bus fleet.[2]

We note that the Task Force described in the bill does not include a representative from communities impacted or likely to be impacted by the production of renewable diesel. It also is not inclusive of a representative either from the electric vehicle industry or from a business association with experience using electric vehicles for trucking or non-road purposes. These missing perspectives would be central to HB 3261's other stated goal, studying "the implications of removing petroleum diesel from the state marketplace."

Increasing demand for "renewable" diesel creates worker and community safety dangers[3], climate damage, and food insecurity.

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[1] https://www.wri.org/insights/california-oil-refineries-biofuels-problematic

[2] https://kingcounty.gov/depts/transportation/metro/programs-projects/innovation-technology/zero-emission-fleet.aspx

[3] https://www.kqed.org/news/11988025/marathons-martinez-refinery-hit-with-state-fines-over-fire-that-burned-worker; https://www.csb.gov/csb-issues-investigation-update-into-november-2023-fire-at-the-marathon-renewables-facility-in-martinez-california/ Producing renewable diesel from vegetable oils requires more hydrogen, creating increased risk of flaring and fires: https://www.energy-re-source.com/_files/ugd/bd8505_757a3372387d46358c74d958d158fcb5.pdf

Significant research indicates that Oregon's current carbon intensity values underestimate the carbon intensity of purpose-grown feedstocks like soybean oil because they do not sufficiently consider the effects of the scale of demand on indirect land use change. Renewable diesel from vegetable oil feedstocks could– in terms of CO2 emissions– end up being worse than petroleum diesel.[4] Current emissions intensity estimates also do not consider the effects of the displacement of feedstocks on total emissions: for example tallow has many industrial uses[5], and fish carcasses are used in pet food and aquaculture.[6]

Food security and deforestation risks from increased demand for renewable diesel are also problematic:

- The senior grains and oilseed analyst at Rabobank estimates 55 - 60 million additional acres of soybeans would be needed for the planned expansion in renewable diesel through 2025. That is roughly the land area of Oregon. The analyst continues, "**Soybeans would basically wipe out corn and wheat acres in the U.S. just to produce enough oil for this."**
- Even when renewable diesel feedstock is sourced only from existing farmland, diverting these oils from the human food supply leads to indirect land use change, often rainforest deforestation, as new farmland is demanded to fill people's basic food needs.[7], The result is climate damage, biodiversity loss, and environmental justice harms to Indigenous communities.
- A Washington Post article titled "Vegetable oil prices soar, far outstripping other food inflation," notes that the war in Ukraine and the drought in Argentina are partial causes of food cost increases, but "**The bigger issue**, Luginsland said, **is the 'push-pull between food usage and fuel**.'"[8]
- A World Resources Institute Report indicates that meeting just half of transportation demand with biofuels would require displacing all of the world's food crops.[9] It is worth noting that producing energy with solar photovoltaic power is far more efficient than biofuels on a per acre basis: Solar requires 30 - 100 times less land[10] and may even beneficially share space with food cropland[11].

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[4] https://theicct.org/u-s-biofuels-policy-lets-not-be-fit-for-failure/ ; https://olis.oregonlegislature.gov/liz/2023R1/Downloads/PublicTestimonyDocument/58604

[5] https://theicct.org/wp-content/uploads/2021/06/ICF_LCFS_Biofuel_Categorization_Final_Report_011816-1.pdf

[6] https://www.easyfish.net/en/blog/fish-by-products-and-their-industrial-uses/

[7] See pg 35 https://theicct.org/wp-content/uploads/2022/01/impact-renewable-diesel-us-jan22.pdf

[8] https://www.washingtonpost.com/business/2022/05/11/vegetable-oil-prices-surge/

[9] p10 https://files.wri.org/d8/s3fs-public/avoiding_bioenergy_competition_food_crops_land.pdf

[10] p4 generally 100x as efficient, ,p14 solar still 30x more productive than most productive potential for cellulosic ethanol https://files.wri.org/d8/s3fs-public/avoiding_bioenergy_competition_food_crops_land.pdf

[11] https://today.oregonstate.edu/news/combining-solar-energy-and-agriculture-mitigate-climate-change-assist-rural-communities

We need real and just climate solutions, and we have so many that can be implemented now. Please do not further support renewable diesel. Instead, turn your attention to the solutions which will benefit Oregonians the most– building solar and wind capacity, enhancing the electrical grid, and promoting efficient, clean electric homes and vehicles.

Thank you,

Helena Birecki
Interim Chair,
Climate Reality Project Portland Chapter

About The Climate Reality Project Portland Chapter

The Climate Reality Project (CRP) Portland Chapter is a local, volunteer-led chapter of The Climate Reality Project, an international nonprofit of 5 million members led by climate leader and former US Vice President Al Gore, whose mission is to catalyze global solutions to the climate crisis. Our legislative committee bases its advocacy on CRP's 5 pillars: a just transition to clean energy, zero carbon transportation, climate justice, green communities, and a fair, representative democracy. climaterealitypdx.com/, www.climaterealityproject.org