



August 17, 2012

Cory-Ann Wind  
Oregon DEQ, Air Quality Division  
Oregon Clean Fuels Program  
811 SW 6<sup>th</sup> Ave.  
Portland, OR 97204

DEQ - HQ  
AIR QUALITY DIVISION

AUG 22 2012

RECEIVED

Dear Ms. Wind,

Thank you for the opportunity to comment on DEQ's proposed rules for the Oregon Clean Fuels Program. Metro believes these rules constitute an essential step in the development of that program. We agree with the approach taken in the proposed rules that all levels of government need to work together:

The Oregon Clean Fuels Program, in concert with other greenhouse gas reduction policies and actions by local governments, other states and the federal government, will reduce Oregon's contribution to the global levels of greenhouse gas emission and the impacts of those emissions in Oregon. (Proposed rule at 340-253-0000 (1))

Here in the Portland metropolitan region, Metro and our local partners have long worked together on issues of regional importance. In 2008 the region agreed on a set of six desired outcomes that together define successful communities. One of those desired outcomes is that the region is a leader in minimizing contributions to climate change.

Metro appreciates that DEQ developed these rules based on extended discussions and recommendations from a technical advisory committee. Metro observed the work of this advisory committee and agrees that the committee's work provides a strong foundation for the program.

We understand the current rulemaking is for Phase 1 of the program and will require Oregon fuel producers and importers to report on the volumes and carbon intensities of the fuels they provide in Oregon. We support the adoption and implementation of these rules because:

- Phase 1 rules will provide information necessary for the development and successful implementation of Phase 2 of the program – the adoption of fuel standards to reduce the average carbon intensity of fuels used in Oregon.

- Metro is currently carrying out a major project at the direction of the Oregon Legislature aimed at reducing greenhouse gas emissions from light-duty vehicles. This project, known as Climate Smart Communities, assumes significant changes in vehicles and technologies, including fuels, if we are to be able to meet the emission reduction targets in state law. We also have developed our plans consistent with Oregon's 10-Year Energy Plan, the State Transportation Strategy, and the Oregon Goal Warming Commission's Roadmap to 2010 – all of which also look to the use of lower carbon fuels.
- Metro is committed to improving the sustainability of our regional solid waste system and looks to the development and availability of clean fuels from and for that system. The Clean Fuels program is expected to increase incentives to develop clean bio-fuels (e.g., bio-diesel from organic wastes) and to provide opportunities to move solid waste vehicles from conventional fuels (e.g., diesel) to renewable and cleaner fuels (e.g., compressed natural gas).

In conclusion, Metro looks forward to the adoption of Phase 1 rules for the Clean Fuels Program and will follow carefully the DEQ's progress on implementing those rules and the development of Phase 2 of the program.

Respectfully,

A handwritten signature in black ink, appearing to read "Martha Bennett". The signature is fluid and cursive, written over a horizontal line.

Martha Bennett  
Chief Operating Officer