From:	HNIDEY Emil
To:	WIND Cory Ann
Cc:	cfp2018
Subject:	FW: Amendments to its Administrative Rules at OAR 340-253
Date:	Friday, August 31, 2018 11:53:50
Attachments:	image001.png

From: Joshua Baker <jfrancisrussell@gmail.com>
Sent: Friday, August 31, 2018 11:52 AM
To: Emil.HNIDEY@state.or.us
Subject: Re: Amendments to its Administrative Rules at OAR 340-253

Thank you for your reply. Investigating further making use of your guidance, reveals more active links that merely circle back to the originating webpage rather than linking to additional information. This is evidenced by the link under the "More information" heading on the CFP 2018 Rulemaking Documents.

Helpful amendments to this information packet, would be:

• Active links from names of Senate and House bills, to the actual text of the bill.
• A detailed explanation of how the EQC's "Phase 1" implementation, requiring transportation fuel providers to keep records, actively serves to reduce pollution associated with the transportation sector.
• Develop public and press releases that better describe rulechange proposals in a concise and meaningful way.

While I do appreciate you reply and explanation on where to find the additional information regarding this notice, a 244 page document has little meaning to most people who:

• Have little or no understanding of the language used
• Are unable to interpret the provided information
• Lack the time or other resources required to read and analyze such a lengthy document.

Such public notices fail to amend the public perception that the Oregon Department of Environmental Quality functions in a transparent manor, taking public comment into consideration when making decisions that effect the communities it serves.

Sincerely, Joshua Baker

On Fri, Aug 31, 2018 at 10:21 AM HNIDEY Emil <Emil.HNIDEY@state.or.us> wrote:

> Hello Mr. Baker,
>
> The Public Notice Packet is accessible through the link under Public involvement. This document

contains the following:

- Invitation to Comment – fact sheet that outlines the proposal and opportunities to comment
- Notice – information and analysis required by APA; Model Rules; DEQ statutes, rules and best practices; and federal regulations
- Proposed Rules – redline/strikethrough of the affected Oregon Administrative Rules

Under Public involvement is also a link which takes you to the comment page where you can submit comments.

In desktop view in an internet browser, this should be located on the right side of the screen as pictured below. In mobile view, it should appear towards the bottom of the page.

I apologize for any confusion caused by the layout of our web page and will look for better ways to display the information in the future.

Thank you.

Emil Hnidey
DEQ - Air Rules Coordinator
700 NE Multnomah St., Suite 600
Portland, OR 97232
Office: 503.229.5946
Cell: 503.539.3926

From: WIND Cory Ann
Sent: Friday, August 31, 2018 9:38 AM
To: HNIDEY Emil <HNIDEY.Emil@deq.state.or.us>
Cc: cfp2018 <cfp2018@deq.state.or.us>
Subject: FW: Amendments to its Administrative Rules at OAR 340-253

Cory-Ann Wind
Oregon Clean Fuels Program Manager
wind.cory@deq.state.or.us
503-229-5388

From: Joshua Baker <jfrancisrussell@gmail.com>
Sent: Friday, August 31, 2018 9:34 AM
To: WIND Cory Ann <WIND.Cory@deq.state.or.us>
Subject: RE: Amendments to its Administrative Rules at OAR 340-253

I received an email notice announcing proposed amendments to administrative rules at OAR 340-253. While public participation is solicited by this communication, the solicitation is meaningless given the lack of information provided on the subject. I clicked on the link under the heading Additional Information, only to find a page on the Oregon DEQ website that offers the same information. Clicking on the two bottom links on that page revert to the exact same page.

The Oregon DEQ has an ongoing problem with public relations, following revelations that the Oregon DEQ has favored the concerns of commercial interests over public safety. Commercial entities, who assumed the Oregon DEQ was monitoring their harmful output and this absolving them of this responsibility have found out that the Oregon DEQ was not properly monitoring the risk these commercial enterprises pose to the community.

Such poorly constructed public communications only further support this public and commercial mistrust, adding to the argument for an overhauled DEQ with regional authority.

Should the Oregon DEQ recognize this shortcoming in their public relations, and recognize the value in employing a communications specialist who is sensitive to the previous shortcomings in this arena, I am available to provide such support.

Sincerely, Joshua Baker