



State of Oregon Department of Environmental Quality

# Written Comments

## Climate 2023 Proposed Rulemaking

This document is a compilation of written comments (e-mail and USPS mail) received during the public comment period for the Climate 2023 Notice of Proposed Rulemaking. The comment period opened August 22, 2023. In response to a request for extension of comment period under ORS 183.335(4), DEQ extended the original comment period by 21 days in order to allow further opportunity to submit comment on the proposed rule amendments until 4 p.m. on Oct. 13, 2023. Only comments received before the deadline are included in this document.

**From:** [David Stone](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** DEQ Rulemaking – Climate 2023 – DEQ is asking for Public Comment on the Proposed Rule Amendments  
**Date:** Wednesday, August 23, 2023 10:47:54 AM

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Sounds good.

I'm for the changes, only if the new rules lead to cleaner air and slow climate change.

- As long as they are rigorously monitored and enforced.
- Not like the Port of Morrow fiasco.
- No proposed fines ultimately negotiated down to meaningless in service to “educating” offenders to get their cooperation.
- Public, widespread disclosure of fine appeal settlements.
- Environmental Justice: Such settlements must correct the offending actions where they occur, no far off mitigation benefiting privileged communities.
- No cronyism with influential businesses.
- Rules must have teeth so those regulated know you mean business.

Weak enforcement is unfair to competitors who obey the rules.

Dave Stone  
Springfield

**From:** [tvos@everyactioncustom.com](mailto:tvos@everyactioncustom.com) on behalf of [Taylor Vos](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Thursday, August 24, 2023 11:45:07 AM

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[You don't often get email from [tvos@everyactioncustom.com](mailto:tvos@everyactioncustom.com). Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision-making. Careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families

and communities.

Sincerely,  
Taylor Vos  
922 E 12th St Des Moines, IA 50316-2944  
tvos@edf.org

**From:** [Anne Cooper](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 10:34:32 AM

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You don't often get email from [annejcooper@forgrassroots.com](mailto:annejcooper@forgrassroots.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Anne Cooper  
3591 Arbor Ave  
Eugene, OR 97402

**From:** [Monica Gilman](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 10:34:50 AM

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You don't often get email from monicagilman@p2a.co. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

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Regards,  
Monica Gilman  
25525 S Laura Ln  
Estacada, OR 97023

**From:** [Christopher Pond](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 10:35:30 AM

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You don't often get email from [padraictheprince@grassrootsmessage.com](mailto:padraictheprince@grassrootsmessage.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Christopher Pond  
4560 Willis Creek Rd  
Winston, OR 97496

**From:** [Jay Humphrey](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 10:35:35 AM

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You don't often get email from blue1jay@advocatefor.me. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

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Regards,  
Jay Humphrey  
25525 S Laura Ln  
Estacada, OR 97023

**From:** [Belinda Colley](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 10:35:45 AM

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You don't often get email from bizebee\_58@yourconstituent.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

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Regards,  
Belinda Colley  
PO Box 152  
Azalea, OR 97410

**From:** [Greg Destro](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 10:35:53 AM

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You don't often get email from gregdes52@grassrootsmessage.com. [Learn why this is important](#)

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Regards,  
Greg Destro  
1223 S 9th St  
Independence, OR 97351

**From:** [Marilyn Costamagna](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 10:35:54 AM

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You don't often get email from gypsywind55@advocatefor.me. [Learn why this is important](#)

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Regards,  
Marilyn Costamagna  
2401 Acorn Way  
Medford, OR 97504

**From:** [Marilee Corey](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 10:35:55 AM

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Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Marilee Corey  
5200 Pettyjohn Rd S  
Salem, OR 97302

**From:** [Cheryl Hunter](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 10:38:28 AM

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Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Cheryl Hunter  
2401 Stansby Way  
Eugene, OR 97405

**From:** [kate rice](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 10:38:28 AM

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Regards,  
kate rice  
3518 SE 72nd Ave  
Portland, OR 97206

**From:** [Ann RPE](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 10:39:33 AM

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Dear Oregon Department of Environmental Quality,

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Regards,  
Ann RPE  
1940 Breyman St NE  
Salem, OR 97301

**From:** [Tracy Richards](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 10:39:44 AM

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You don't often get email from [mistracyr@grassrootsmessage.com](mailto:mistracyr@grassrootsmessage.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

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Regards,  
Tracy Richards  
13900 SE Highway 212 Unit 175  
Clackamas, OR 97015

**From:** [Mitchell Stargrove](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 10:40:33 AM

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Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Mitchell Stargrove  
25665 SW Wolsborn Ave  
Hillsboro, OR 97123

**From:** [Wayne Kelly](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 10:41:21 AM

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Dear Oregon Department of Environmental Quality,

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Regards,  
Wayne Kelly  
258 A St  
Ashland, OR 97520

**From:** [Roger May](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 10:42:46 AM

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Dear Oregon Department of Environmental Quality,

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Regards,  
Roger May  
2379 Bell Ct  
Medford, OR 97504

**From:** [Barbara Jansen](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 10:44:40 AM

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You don't often get email from [bobbie.jansen@sendgrassroots.com](mailto:bobbie.jansen@sendgrassroots.com). [Learn why this is important](#)

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**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Barbara Jansen  
31618 Bryant Way SW  
Albany, OR 97321

**From:** [Michael Prestia](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 10:49:18 AM

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You don't often get email from michaelgprestia@advocacymessages.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Michael Prestia  
8833 N Syracuse St Apt 18  
Portland, OR 97203

**From:** [Jim Gear](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 10:51:23 AM

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You don't often get email from jimgear@advocatesmessage.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Jim Gear  
2211 Spring St  
Medford, OR 97504

**From:** [Patty Cleveland](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 10:52:27 AM

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You don't often get email from pkcleve@forgrassroots.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Patty Cleveland  
350 Pearl St  
Eugene, OR 97401

**From:** [Karl Thompson](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 10:58:28 AM

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You don't often get email from kbt.pdx@advocacymessages.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Karl Thompson  
2815 SE 58th Ave  
Portland, OR 97206

**From:** [bobo\\_HAMMOND](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 11:00:43 AM

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You don't often get email from metoliusbob@foradvocacy.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
bobo HAMMOND  
1649 W Carson Ave  
Sisters, OR 97759

**From:** [Sue Leonetti](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 11:01:23 AM

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You don't often get email from tleonetti3@advocacymessages.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Sue Leonetti  
88282 Forest Meadows Ln  
Veneta, OR 97487

**From:** [Marie Rodriguez](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 11:02:18 AM

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You don't often get email from iamfit62@grassrootsmessage.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Marie Rodriguez  
2115 N Townsend Rd  
Hermiston, OR 97838

**From:** [Thomas Budd](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 11:03:26 AM

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You don't often get email from tbudd62@advocatefor.me. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Thomas Budd  
2750 Portland St  
Eugene, OR 97405

**From:** [Harry Freiberg](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 11:17:36 AM

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You don't often get email from hap@yourconstituent.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Harry Freiberg  
610 Mardon Ct  
Brookings, OR 97415

**From:** [Marjorie Walters](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 11:19:00 AM

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You don't often get email from [marjoriwalters@sendgrassroots.com](mailto:marjoriwalters@sendgrassroots.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Marjorie Walters  
1930 NW Irving St  
Portland, OR 97209

**From:** [Susan Metzler](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 11:20:18 AM

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You don't often get email from sue.metzler@sendgrassroots.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Susan Metzler  
305 S Montgomery St  
Portland, OR 97201

**From:** [Julie Williams](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 11:23:40 AM

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You don't often get email from [juliewawilliams@sendgrassroots.com](mailto:juliewawilliams@sendgrassroots.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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I look to the future for my nieces and nephews and I want to see change for the common good, so their future can be healthy and inspiring.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Julie Williams  
1333 NW 17th St  
Corvallis, OR 97330

**From:** [David Scott](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 11:26:17 AM

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You don't often get email from [scott0547@yourconstituent.com](mailto:scott0547@yourconstituent.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

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Regards,  
David Scott  
24 S 12th St  
Cottage Grove, OR 97424

**From:** [Deborah Lackowitz](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 11:30:59 AM

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You don't often get email from [debbie061653@advocacymessages.com](mailto:debbie061653@advocacymessages.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Deborah Lackowitz  
1911 N Pine St  
Canby, OR 97013

**From:** [Jeanne Pierre](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 11:35:39 AM

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You don't often get email from [jeannestpierre@advocatefor.me](mailto:jeannestpierre@advocatefor.me). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

Regards,  
Jeanne Pierre  
5583 Oak Heights Ct SE  
Salem, OR 97306

**From:** [Sara Safdie](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 11:44:07 AM

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You don't often get email from [ssafdie526@advocatesmessage.com](mailto:ssafdie526@advocatesmessage.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Sara Safdie  
3903 SW Marigold St  
Portland, OR 97219

**From:** [Randy Harrison](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 11:45:53 AM

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Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

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Regards,  
Randy Harrison  
4051 Wagner St  
Eugene, OR 97402

**From:** [Phyllis Whittington](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 12:10:29 PM

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You don't often get email from [phyllismwhittington@yourconstituent.com](mailto:phyllismwhittington@yourconstituent.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

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Regards,  
Phyllis Whittington  
7840 SW Walnut Ln  
Portland, OR 97225

**From:** [greeley wells](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 12:14:23 PM

---

You don't often get email from [greeley@advocatesmessage.com](mailto:greeley@advocatesmessage.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
greeley wells  
5253 Carberry Creek Rd  
Jacksonville, OR 97530

**From:** [Lyle Funderburk](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 12:14:57 PM

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You don't often get email from [lyle.funderburk@advocatefor.me](mailto:lyle.funderburk@advocatefor.me). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Lyle Funderburk  
10003 SE Foster Rd  
Portland, OR 97266

**From:** [Marie Hutchens](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 12:18:23 PM

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You don't often get email from [corrinehutchens7@yourconstituent.com](mailto:corrinehutchens7@yourconstituent.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Marie Hutchens  
1665 Hayes St  
Eugene, OR 97402

**From:** [Chip Hall](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 12:18:52 PM

---

You don't often get email from chiphall75@grsdelivery.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Chip Hall  
481 Manzanita Ave  
Manzanita, OR 97130

**From:** [Carol Salami-Goswick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 12:23:37 PM

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You don't often get email from carol-salamigoswick@grsdelivery.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Carol Salami-Goswick  
1646 Provincial Way  
Eugene, OR 97401

**From:** [Nina French](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 12:27:09 PM

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You don't often get email from [snowflakeschance@grsdelivery.com](mailto:snowflakeschance@grsdelivery.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Nina French  
8647 NE Tillamook St  
Portland, OR 97220

**From:** [Molly Barbano](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 12:41:45 PM

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You don't often get email from [mollybbaker@p2a.co](mailto:mollybbaker@p2a.co). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Molly Barbano  
758 Sacre Ln N  
Monmouth, OR 97361

**From:** [Paul Borcharding](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 12:44:54 PM

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You don't often get email from pb\_palomine@p2a.co. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Paul Borcharding  
3302 N Columbia St  
La Grande, OR 97850

**From:** [Juanita Rinas](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 12:55:00 PM

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You don't often get email from solacdncs@grsdelivery.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

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Regards,  
Juanita Rinas  
975 Lewis Ave  
Eugene, OR 97402

**From:** [R. Nerwick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 12:56:27 PM

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You don't often get email from rnerwick@sendgrassroots.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

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Regards,  
R. Nerwick  
3438 SE Mary Ct  
Milwaukie, OR 97222

**From:** [janna piper](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 12:59:35 PM

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You don't often get email from [jaqalthehybrid@forgrassroots.com](mailto:jaqalthehybrid@forgrassroots.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

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Regards,  
janna piper  
PO Box 15072  
Portland, OR 97293

**From:** [Veroune Chittim](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 1:21:58 PM

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You don't often get email from [verounechittim2@advocatesmessage.com](mailto:verounechittim2@advocatesmessage.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Veroune Chittim  
PO Box 297  
Selma, OR 97538

**From:** [Melissa Reel](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 1:40:48 PM

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Dear Oregon Department of Environmental Quality,

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Regards,  
Melissa Reel  
507 SE Riverside Ave  
Grants Pass, OR 97526

**From:** [Jennifer Love](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 1:43:40 PM

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You don't often get email from [lovejm@sendgrassroots.com](mailto:lovejm@sendgrassroots.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Jennifer Love  
4075 Pearl St  
Eugene, OR 97405

**From:** [Paul Swain](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 2:17:04 PM

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You don't often get email from pcnbswain@yourconstituent.com. [Learn why this is important](#)

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**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Paul Swain  
5001 NE 36th Ave  
Portland, OR 97211

**From:** [Bridget Wyatt](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 2:17:46 PM

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You don't often get email from [bridgetmichelle07@advocacymessages.com](mailto:bridgetmichelle07@advocacymessages.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Bridget Wyatt  
783 NW Naito Pkwy  
Portland, OR 97209

**From:** [Mary Thiel](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 2:27:23 PM

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You don't often get email from [mjthiel1090@yourconstituent.com](mailto:mjthiel1090@yourconstituent.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Mary Thiel  
6816 SE 86th Ave  
Portland, OR 97266

**From:** [Lisa Read](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 2:45:25 PM

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You don't often get email from lisaread9@yourconstituent.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Lisa Read  
8717 SE Monterey Ave  
Happy Valley, OR 97086

**From:** [Daiv Skinner](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 2:55:01 PM

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You don't often get email from wows\_trope0t@grsdelivery.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The evidence is clear: we only have a limited time to act and cut greenhouse gas emissions in order to prevent irreversible and catastrophic climate impacts. Unfortunately, Oregon has not done enough to achieve the necessary emissions reductions to meet critical climate goals. We are currently 19% short of our 2020 target, and our existing policies are inadequate to meet President Biden's commitment to cut U.S. emissions by 50% from 2005 levels by 2030. Without additional measures, lives and livelihoods will be at risk.

We need to increase our ambition and seize every opportunity to strengthen Oregon's climate programs. The Climate Protection Program (CPP) is crucial in holding polluters accountable, becoming only the third program in the nation to establish an enforceable, declining cap on emissions from transportation and natural gas use. It is vital that we do not allow any weakening of the CPP.

I am concerned that the draft rules proposed by the Department of Environmental Quality (DEQ) will weaken the Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must ensure the following:

1. Climate, economic, and public health benefits for Oregonians: DEQ's draft rules determine how biomethane and hydrogen can be used for CPP compliance. I urge DEQ to restrict the use of biomethane for compliance to projects that directly benefit Oregonians, rather than allowing natural gas companies to rely on out-of-state investments. In order to achieve the necessary benefits, it is essential that we focus on cutting pollution within our own state. Additionally, the full environmental impacts of biomethane and hydrogen fuels must be accounted for in CPP compliance obligations. We must consider the risks and potential warming effect of hydrogen leakage, as well as accurately reflect the climate impacts of biogas based on its source and injection methods.
2. Industrial sources of emissions: All large industrial emitters must be held accountable for their greenhouse gas emissions. It is crucial that DEQ ensures comprehensive coverage of climate pollution. Any new stationary source or proposed modification with the potential for greenhouse gas emissions should be required to complete a best available emissions reductions (BAER) assessment. These assessments must be transparent and allow for meaningful public review and input. Moreover, the BAER assessments must translate into concrete emission reduction requirements aligned with science-based goals. Currently, industrial emissions are exempted from binding reduction requirements consistent with the CPP's declining emissions cap. These industrial sources account for approximately 20% of Oregon's total emissions, and projections indicate that their emissions will continue to rise. It is unacceptable that emissions from these sources could increase under the CPP, endangering Oregon's climate future. DEQ must ensure that industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking process will have significant implications for Oregon's ability to reduce

climate pollution and hold polluters accountable. It is crucial that the final rules deliver a stronger Climate Protection Program that prioritizes the well-being of Oregon's families and communities.

Regards,  
Daiv Skinner  
1340 Jefferson St NE  
Salem, OR 97301

**From:** [Stephen Johnson](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 3:07:58 PM

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You don't often get email from seasaj777@advocatefor.me. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

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**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Stephen Johnson  
3385 SW 100th Ave  
Portland, OR 97225

**From:** [Sara Wilkes](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 3:22:34 PM

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You don't often get email from [slizwilkes@advocatefor.me](mailto:slizwilkes@advocatefor.me). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Sara Wilkes  
5278 Berkshire Ct SE  
Salem, OR 97306

**From:** [Larry Morningstar](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 3:31:46 PM

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You don't often get email from manapranabanana@forgrassroots.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Larry Morningstar  
315 S 1st St  
Talent, OR 97540

**From:** [Martha Stevens](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 3:41:13 PM

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You don't often get email from [martystevens.55@grassrootsmessage.com](mailto:martystevens.55@grassrootsmessage.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Martha Stevens  
502 Donald St  
Wallowa, OR 97885

**From:** [lorraine foster](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 3:50:31 PM

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You don't often get email from [lorraine.rae.foster@advocatesmessage.com](mailto:lorraine.rae.foster@advocatesmessage.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
lorraine foster  
8205 SE 9th Ave  
Portland, OR 97202

**From:** [Dana Weintraub](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 4:16:44 PM

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You don't often get email from evergreensustainabilityllc@grsdelivery.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

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most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Dana Weintraub  
17124 SW Marty Ln  
Beaverton, OR 97006

**From:** [Steve Wilson](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 4:31:37 PM

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You don't often get email from [safe\\_drvr@forgrassroots.com](mailto:safe_drvr@forgrassroots.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Steve Wilson  
305 Tumbleweed Ct  
West Richland, WA 99353

**From:** [Danny Dyche](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 4:33:27 PM

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You don't often get email from [yxa24ym1@grassrootsmessage.com](mailto:yxa24ym1@grassrootsmessage.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science demonstrates that we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate harm. Oregonians are already experiencing dangerous climate and health effects as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

Yet Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut American emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we must not miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

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will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. This rulemaking must deliver a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Danny Dyche  
902 SE Marinette Ave  
Hillsboro, OR 97123

**From:** [Alan Lawrence](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 5:01:58 PM

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You don't often get email from amethystpurple1@grsdelivery.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Alan Lawrence  
6901 N Haight Ave  
Portland, OR 97217

**From:** [Michael Renfrow](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 5:05:17 PM

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You don't often get email from [pdxbeartooth@advocatefor.me](mailto:pdxbeartooth@advocatefor.me). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Michael Renfrow  
205 NE 58th Ave  
Portland, OR 97213

**From:** [Kelly Brignell](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 5:31:06 PM

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Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

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Regards,  
Kelly Brignell  
1747 SW Sunset Blvd  
Portland, OR 97239

**From:** [angie heide](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 5:36:26 PM

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You don't often get email from [angieheide@grsdelivery.com](mailto:angieheide@grsdelivery.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
angie heide  
1420 SE 16th Ave  
Portland, OR 97214

**From:** [Ann Nowicki](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 5:44:11 PM

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You don't often get email from [tazzannie975@advocatefor.me](mailto:tazzannie975@advocatefor.me). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Ann Nowicki  
3355 N Delta Hwy  
Eugene, OR 97408

**From:** [Samuel Carl](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 6:38:52 PM

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Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

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Regards,  
Samuel Carl  
7321 Sarah Ln S  
Salem, OR 97306

**From:** [Gina Norman](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 6:58:19 PM

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Dear Oregon Department of Environmental Quality,

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Regards,  
Gina Norman  
3436 NE 73rd Ave.  
Portland, OR 97213

**From:** [Cory Pinckard](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 7:34:47 PM

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You don't often get email from [corypinckard@grsdelivery.com](mailto:corypinckard@grsdelivery.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Oregon owes a lot of its strengths to rail infrastructure, much of which unfortunately no longer even exists (including the Oregon Electric and Red Electric Interurban Passenger Railways, an elaborate and extensive streetcar grid they interfaced with as well as an integrated bunch of trolley lines.) The turncoat auto industry lobbied to have our taxpayer dollars funded passenger interurban and municipal routes torn out and paved over or else neglected into failure after privatization in acts of premeditated sabotage and treachery; this is before they further betrayed the nation by moving manufacturing out of country decimating the American workforce to only be rewarded for this sedition by being subsidized by our taxes along with being bailed out multiple times only for the executives to pocket the money we were taxed for their personal profits of plunder and pilfering pillage. The further we move away from the logical layout provided by streetcar grids and electric commuter interurban railroads the uglier and less livable the city and its suburbs become. An intelligent coastal city would take advantage of this limited time of people crowding in to install city assets that will benefit us for generations such as a rail route beneath the Willamette meaning the Steel Bridge won't break the light rail circuit interrupting all MAX lines every time it lifts, and railway going between Vancouver and Portland when the new bridge is finally finished. I-5 should be buried on the inner east side stretch to make the area tolerable and reclaim space for the Black community to rebuild their community they had stolen from them. The WES should expand to extend down to Salem reuniting the Portland metropolitan area with our capital. It makes perfect sense to build the full Southwest Corridor (Purple) Line with railway stations on Marquam Hill and at Portland Community College Sylvania Campus, for example, and zero sense not to.

Electric cars also destroy the environment through resource mining, manufacturing processes and ultimately going to the landfill in mass droves. The pollution they cause is simply unnecessary as is the amount of urban space squandered on parking and other paved over autocentric wastes. MORE VEHICLES ON THE ROAD MEANS MORE AVOIDABLE DEATHS WILL CONTINUE TO CONSTANTLY OCCUR! They also perpetuate redlining, urban sprawl, the food deserts that come from that invariably, along with cities that are not navigable as a pedestrian or bicyclist and are, in fact, inhospitable to humanity along with being lethally horrendous towards animals. They add to traffic congestion. Commodification of societal needs and normalization of trying to substitute rampant consumerism where we need standardized, regulated and uniform public utilities doesn't work.

Putting the financial burden of transportation inefficiently and directly on the individual citizen is simply not wise or fair and hasn't been the norm for even 80 years. We need to invest in commuter rail that's properly implemented as it typically is overseas. A commuter rail system is an engineering marvel while buses are just buses. The most reliable predictor of a neighborhood being impoverished is if it has no commuter rail connection. The American people are apathetic through decades of disenfranchisement and a lot of that marginalization (eg Robert Moses's racist urban renewal) is through divestment of public infrastructure, utilities and programs to help the American people. We can't undo the social inequities

inflicted upon and retained by redlining until we transcend the highway robbery carcentric built habitat that physically structurally reinforces them. We're past the point of car dominated transportation being anything better than a tragic hindrance or an outright travesty. Public works materially improving life for the taxpaying citizenry will bolster civic pride.

Transcontinental High Speed Rail should integrate seamlessly with commuter rail networks so it can evenly function as one cohesive system and this will convert flyover country (CONUS flights should be virtually eliminated) back into a thriving heartland by functioning as an artery of commute and commerce which will reduce clustering on the coasts. Similarly, wholly integrated circuits of commuter rail blended with interurban routes, light rail lines, street car grids, subways, and even trolleys along with electric ferries functioning together as a comprehensive, coherent series of interwoven systems would prevent people from having to live on top of each other in city centers in order to have quick access to urban cores and downtown areas so this would stimulate our local economies and prevent gentrification from demolishing cherished heirlooms of our historicity, destroying our classic neighborhoods, shredding the fabric of our communities and toppling our civic landmarks and architectural heirlooms along with other social capital such as venerable culture generating venues. We lost so many marvelous structures for nothing more than mere surface lots as our city was hollowed out on the heels of white flight to the lily white, poorly planned suburbs. Whole swaths of communities were obliterated in a racist/classist attack on the people of Portland and we lost entire neighborhoods along with cultural centers such as the Jazz District, our Italian and Jewish neighborhoods as well as other minorities who weren't even assisted with any sort of fair, decent assistance to relocate. The absolute annihilation of our city still adversely hinders us collectively to this hamstrung day, and the groups targeted, intensely even if so many folks don't know enough to connect the dots of cause and effect.

Numerous studies show that built environments of homogenously bleak and bland duplitecture dreck that profiteering developers push on us for their privatized gains to our public loss for the riches of themselves and corporate slumlords not only cause homelessness from being financially inaccessible to most Americans, but also cause depression from creating such a devastatingly sterile, cold, unloving urban habitat that's too congested and overcrowded to work properly as a correctly engineered built environment. Our roadways are overcrowded and no amount of widening them and adding lanes will do anything to help it because it just leads to induced demand that inevitably grinds to a halt at snags and bottlenecks down the road. Shouldn't American cities be thriving centers of culture and character rather than austere and chintzy morasses of mediocrity?

I believe that we can design the cities of our nation to reflect a future that embraces humanity and that we also must for America to have any sort of a bright future ahead of it. Right now we are mired in the destruction of our cities from the inward attacking neocolonial oppressors who weaponize their clout of wealth against the nation for their own off-shore un-American gains of privileged, parasitic, private profits. This greed fueled anti-social exploitation is present day feudalism driving us into another gilded age. Tons of new petrochemical building "luxury living" housing units remain empty serving only as financial assets in investment portfolios of hedge fund, "private equity" and permanent capital firm cretins sheltering dubiously acquired wealth instead of as direly needed shelter for humans. We deserve a landscape we can be proud of and country should come first before corporate looting and exploitation. Legacies are important and live on forever.

With space opened up in our cities we could rebuild beloved structures now gone missing

from economic and environmental disaster utilizing new technologies such as hempcrete and 3-D printing. We could create vertical agriculture, green pocket areas, etc. on spots currently now just serving as paved over squares and nothing more. 20% of Portland is parking lots and paved over area not even suitable for that inefficient usage. We can extend democracy into offering the taxpayer residents democratic say in what their city consists of, how it looks and how it operates promoting civic engagement and participation.

Regards,  
Cory Pinckard  
10830 SW Canterbury Ln  
Tigard, OR 97224

**From:** [Linda Skonberg](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 8:16:17 PM

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You don't often get email from lskonberg@foradvocacy.com. [Learn why this is important](#)

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Regards,  
Linda Skonberg  
564 Wildcat Canyon Rd  
Sutherlin, OR 97479

**From:** [Debra Spies](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 8:21:34 PM

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Dear Oregon Department of Environmental Quality,

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Regards,  
Debra Spies  
4283 E Amazon Dr  
Eugene, OR 97405

**From:** [Pamela Doran](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 8:37:33 PM

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Regards,  
Pamela Doran  
2516 SE Gosling Ln  
Waldport, OR 97394

**From:** [dolly\\_marshall](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 8:50:39 PM

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Regards,  
dolly marshall  
1970 10th St  
Springfield, OR 97477

**From:** [Susan Heath](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 8:53:09 PM

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You don't often get email from [forbux@sendgrassroots.com](mailto:forbux@sendgrassroots.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

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Regards,  
Susan Heath  
2552 Mount Vernon St SE  
Albany, OR 97322

**From:** [Steven Edmonds](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, August 28, 2023 10:06:44 PM

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Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Steven Edmonds  
480 Glide Loop Dr  
Glide, OR 97443

**From:** [Kathleen Mitchell](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, August 29, 2023 12:15:01 AM

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You don't often get email from [kathy.mitchell5232@yourconstituent.com](mailto:kathy.mitchell5232@yourconstituent.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Kathleen Mitchell  
5232 SE Madison St  
Portland, OR 97215

**From:** [Nancy Mendoza](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, August 29, 2023 4:13:30 AM

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Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Nancy Mendoza  
370 E Coe Ave  
Stanfield, OR 97875

**From:** [Jay Skinner](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, August 29, 2023 5:23:58 AM

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You don't often get email from [jay\\_d\\_skinner@forgrassroots.com](mailto:jay_d_skinner@forgrassroots.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Jay Skinner  
1041 SW Mark St  
Newport, OR 97365

**From:** [Mary Buckley](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, August 29, 2023 8:50:45 AM

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Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Mary Buckley  
6525 NE 36th Ave  
Portland, OR 97211

**From:** [Cherine Bauer](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, August 29, 2023 8:53:11 AM

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Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Cherine Bauer  
85 River Loop 1  
Eugene, OR 97404

**From:** [Linda Bolduan](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, August 29, 2023 12:47:57 PM

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Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Linda Bolduan  
1700 Skyland Dr  
Lake Oswego, OR 97034

**From:** [Kay Firor](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, August 29, 2023 1:10:55 PM

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You don't often get email from [kay@advocatesmessage.com](mailto:kay@advocatesmessage.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts, and we have to do it now. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent,

with members of the public given a meaningful opportunity to provide review and input. And most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Kay Firor  
70177 Ponderosa Ln  
Cove, OR 97824

**From:** [Phyllis Grove](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, August 29, 2023 1:29:06 PM

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You don't often get email from mallardchestnut@p2a.co. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Phyllis Grove  
2341 NW Floyd Ln  
Bend, OR 97703

**From:** [Kim Wick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, August 29, 2023 2:43:38 PM

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You don't often get email from wickward@foradvocacy.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Kim Wick  
26001 NW Highway 47  
Buxton, OR 97109

**From:** [Jodie Cord](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, August 29, 2023 2:44:35 PM

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You don't often get email from [jodie.cord@advocatesmessage.com](mailto:jodie.cord@advocatesmessage.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Jodie Cord  
614 NE Sumner St  
Portland, OR 97211

**From:** [Dorothy Louis](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, August 29, 2023 2:50:52 PM

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You don't often get email from dlouis264@yourconstituent.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Dorothy Louis  
2118 53rd Ave SE  
Albany, OR 97322

**From:** [Sara Lektorich](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, August 29, 2023 3:03:59 PM

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Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Sara Lektorich  
1080 Edwina Ave  
Central Point, OR 97502

**From:** [Stephen Oder](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, August 29, 2023 3:05:53 PM

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You don't often get email from [steveoder@grassrootsmessage.com](mailto:steveoder@grassrootsmessage.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Stephen Oder  
1865 NE Seavy Ave  
Corvallis, OR 97330

**From:** [Carissa Wells](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, August 29, 2023 3:21:48 PM

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You don't often get email from [carissa.wells@yourconstituent.com](mailto:carissa.wells@yourconstituent.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Carissa Wells  
32795 NE Chamberlain Rd  
Corbett, OR 97019

**From:** [Thorne Davis](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, August 29, 2023 3:28:53 PM

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You don't often get email from [heartfoak8@sendgrassroots.com](mailto:heartfoak8@sendgrassroots.com). [Learn why this is important](#)

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The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Thorne Davis  
Portland, OR 97217

**From:** [Barbara Weaver](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, August 29, 2023 3:54:28 PM

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You don't often get email from bkweaver45@advocatesmessage.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Barbara Weaver  
10457 SE Cook Ct Apt 262  
Portland, OR 97222

**From:** [Caroline Taylor](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, August 29, 2023 5:12:44 PM

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You don't often get email from carjtaylor@foradvocacy.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Caroline Taylor  
1055 High St  
Eugene, OR 97401

**From:** [Karen Boseke](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, August 29, 2023 5:30:42 PM

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You don't often get email from karenboseke42@grsdelivery.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Karen Boseke  
3917 Frieda Ave  
Klamath Falls, OR 97603

**From:** [Jaime Trachsel](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, August 29, 2023 5:55:05 PM

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You don't often get email from [jaimetrachsel@advocacymessages.com](mailto:jaimetrachsel@advocacymessages.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Jaime Trachsel  
63139 Fresca St  
Bend, OR 97703

**From:** [Deb Yturralde](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, August 29, 2023 5:58:02 PM

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You don't often get email from debthorpemom@p2a.co. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Deb Yturralde  
1130 Barrington Cir  
Ashland, OR 97520

**From:** [Kevin Smith](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, August 29, 2023 6:24:30 PM

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You don't often get email from kevsc211@grassrootsmessage.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Kevin Smith  
1565 Siskiyou Blvd  
Ashland, OR 97520

**From:** [sofia buschman](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, August 29, 2023 6:27:20 PM

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You don't often get email from buschmansofie@advocatefor.me. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
sofia buschman  
2112 NW Woodland Dr  
Corvallis, OR 97330

**From:** [Mary Cassell](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, August 29, 2023 6:55:30 PM

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You don't often get email from [vcassell@grsdelivery.com](mailto:vcassell@grsdelivery.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Mary Cassell  
2960 High St  
Eugene, OR 97405

**From:** [HAILEY LUNDQUIST](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, August 29, 2023 7:17:55 PM

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You don't often get email from [lundquisthailey@advocatesmessage.com](mailto:lundquisthailey@advocatesmessage.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

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Regards,  
HAILEY LUNDQUIST  
13531 Clairmont Way  
Oregon City, OR 97045

**From:** [Natalie Gregorek](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, August 29, 2023 8:21:47 PM

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You don't often get email from natalie.c.g2@p2a.co. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Natalie Gregorek  
1125 NW 12th Ave  
Portland, OR 97209

**From:** [Jan Ostebo](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, August 29, 2023 8:46:06 PM

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You don't often get email from [freedomhelper@forgrassroots.com](mailto:freedomhelper@forgrassroots.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Jan Ostebo  
804 2nd Ave  
Seaside, OR 97138

**From:** [Jonathan Small](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, August 29, 2023 9:15:01 PM

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Dear Oregon Department of Environmental Quality,

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Regards,  
Jonathan Small  
1500 Norkenzie Rd  
Eugene, OR 97401

**From:** [Sara Adams](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, August 29, 2023 9:24:01 PM

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You don't often get email from [sarakissme@foradvocacy.com](mailto:sarakissme@foradvocacy.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Sara Adams  
3623 NE 115th Ave  
Portland, OR 97220

**From:** [kennedy.shostak](mailto:kennedy.shostak)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, August 29, 2023 9:57:30 PM

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You don't often get email from [kennedyshostak@yourconstituent.com](mailto:kennedyshostak@yourconstituent.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

If the environment is not protected in Oregon then where? I have lived here all my life. Spent every day in our nearby national parks. To see our environment go to waste would be a shame. We feel the heat and have not forgotten what the snow used to be. We know our power will be massively effected through climate change. Current generations must suffer through the consequences of our past environmental decisions. There will be no future if we forget the impact of the present.

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
kennedy shostak  
702 SE Wendy Ln  
Gresham, OR 97080

**From:** [Jillian Emerson](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, August 29, 2023 10:09:58 PM

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You don't often get email from [jllnemerson@grassrootsmessage.com](mailto:jllnemerson@grassrootsmessage.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Jillian Emerson  
Portland, OR 97206

**From:** [Debra Murray](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, August 29, 2023 10:54:34 PM

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Dear Oregon Department of Environmental Quality,

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**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Debra Murray  
92060 Maple Ln  
Springfield, OR 97478

**From:** [Stephanie Green](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, August 29, 2023 11:02:32 PM

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You don't often get email from onymagynos@grsdelivery.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

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Regards,  
Stephanie Green  
475 SE Summit Dr  
Roseburg, OR 97470

**From:** [Vicki Swartz](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, August 29, 2023 11:07:11 PM

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You don't often get email from v.swartz@advocatesmessage.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Vicki Swartz  
429 SW 70th Terrace  
Portland, OR 97225

**From:** [jessica kelsey](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, August 29, 2023 11:21:39 PM

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You don't often get email from [jessicakelsey21@grsdelivery.com](mailto:jessicakelsey21@grsdelivery.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
jessica kelsey  
2005 SW Custer St  
Portland, OR 97219

**From:** [Wes a](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Wednesday, August 30, 2023 4:51:33 AM

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You don't often get email from abbyank1@forgrassroots.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

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Regards,  
Wes a  
Astoria, OR 97103

**From:** [Rita Morey](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Wednesday, August 30, 2023 5:05:34 AM

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You don't often get email from [morey.rita@yourconstituent.com](mailto:morey.rita@yourconstituent.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Rita Morey  
3270 Riverplace Dr  
Eugene, OR 97401

**From:** [Lynsey Wakeland](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Wednesday, August 30, 2023 6:10:59 AM

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You don't often get email from [lynsey.oordt@yourconstituent.com](mailto:lynsey.oordt@yourconstituent.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Lynsey Wakeland  
6529 NE Dogwood St  
Hillsboro, OR 97124

**From:** [Dick Merrill](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Wednesday, August 30, 2023 7:02:07 AM

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You don't often get email from bluescat@advocatefor.me. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Dick Merrill  
1160 3rd St NE  
Bandon, OR 97411

**From:** [Cody Ricketts](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Wednesday, August 30, 2023 8:53:20 AM

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Dear Oregon Department of Environmental Quality,

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Cody Ricketts  
2285 Park Ave NE  
Salem, OR 97301

**From:** [Linea Fuller](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Wednesday, August 30, 2023 9:22:19 AM

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You don't often get email from [lineafuller2@foradvocacy.com](mailto:lineafuller2@foradvocacy.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

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Regards,  
Linea Fuller  
18137 Fadjur Ln  
Sisters, OR 97759

**From:** [Craig DMello](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Wednesday, August 30, 2023 9:27:07 AM

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You don't often get email from craigad2001@sendgrassroots.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Hello, I am an aspiring scientist soon to graduate with my B.S. in physics at U of O. I've lived in Oregon my entire life and the one thing I've always been proud of is how much better than most of the advanced world we are at caring for our environment. But we need to be vigilant. Anyone with any sort of power needs to be doing everything they can to put the nail in fossil fuel companies' coffin. So please, do the right thing. Strengthen green policies, and continue using science to inform decisions.

Regards,  
Craig DMello  
712 E 14th Ave  
Eugene, OR 97401

**From:** [Baylee Merlock](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Wednesday, August 30, 2023 9:32:58 AM

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You don't often get email from bayleerae1204@yourconstituent.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Baylee Merlock  
124 Dobie Ct  
Roseburg, OR 97470

**From:** [William O'Brien](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Wednesday, August 30, 2023 9:46:23 AM

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You don't often get email from wobobr123@sendgrassroots.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
William O'Brien  
12520 SW Gem Ln  
Beaverton, OR 97005

**From:** [Frank Rouse](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Wednesday, August 30, 2023 10:02:42 AM

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You don't often get email from [redpaintpeople@advocacymessages.com](mailto:redpaintpeople@advocacymessages.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Frank Rouse  
21710 S Green Mountain Rd  
Colton, OR 97017

**From:** [Berie DeFrancesco](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Wednesday, August 30, 2023 11:14:04 AM

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You don't often get email from [bjdefrancesco@yourconstituent.com](mailto:bjdefrancesco@yourconstituent.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Berie DeFrancesco  
39 Aquinas  
Lake Oswego, OR 97035

**From:** [Elisabeth Shaver](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Wednesday, August 30, 2023 11:29:32 AM

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You don't often get email from [esprovence@foradvocacy.com](mailto:esprovence@foradvocacy.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Elisabeth Shaver  
935 Koala St N  
Keizer, OR 97303

**From:** [Karen Murray](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Wednesday, August 30, 2023 5:04:08 PM

---

You don't often get email from murrkat@p2a.co. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Karen Murray  
2646 E 11th St  
The Dalles, OR 97058

**From:** [michael mcdaniel](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Wednesday, August 30, 2023 7:19:23 PM

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You don't often get email from braintumorboy@foradvocacy.com. [Learn why this is important](#)

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**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
michael mcdaniel  
2132 SW 19th St  
Redmond, OR 97756

**From:** [Brooke Shaver](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Wednesday, August 30, 2023 8:00:47 PM

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You don't often get email from brookshaver227@p2a.co. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Brooke Shaver  
33703 SE Myrtle St Apt D  
Scappoose, OR 97056

**From:** [Valerie Snyder](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Wednesday, August 30, 2023 8:08:05 PM

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You don't often get email from [mvensnyder@sendgrassroots.com](mailto:mvensnyder@sendgrassroots.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Valerie Snyder  
3311 Valley Crest Way  
Forest Grove, OR 97116

**From:** [Golden Cutting](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Wednesday, August 30, 2023 9:44:26 PM

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You don't often get email from powa40@p2a.co. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

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Regards,  
Golden Cutting  
1133 Olive St  
Eugene, OR 97401

**From:** [Wendy Holzman](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Wednesday, August 30, 2023 10:04:20 PM

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You don't often get email from wendomere@advocatesmessage.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Wendy Holzman  
61486 Hackleman Ct  
Bend, OR 97702

**From:** [Stanley Green](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Wednesday, August 30, 2023 10:29:33 PM

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You don't often get email from stangree7@grsdelivery.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Stanley Green  
90157 Valley Vista Dr  
Elmira, OR 97437

**From:** [Lee Taylor](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Wednesday, August 30, 2023 10:37:33 PM

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You don't often get email from kaaawamoon@grassrootsmessage.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

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Regards,  
Lee Taylor  
8747 SW Brightfield Cir  
Portland, OR 97223

**From:** [Delilah Lebec-Schoenfeldt](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Thursday, August 31, 2023 12:26:15 AM

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You don't often get email from [delilahlebec@forgrassroots.com](mailto:delilahlebec@forgrassroots.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Delilah Lebec-Schoenfeldt  
4431 SW Coronado St  
Portland, OR 97219

**From:** [Sally Wall](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Thursday, August 31, 2023 6:17:22 AM

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You don't often get email from sallywall6@forgrassroots.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Sally Wall  
Beaverton, OR 97008

**From:** [Anna Walter](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Thursday, August 31, 2023 6:29:52 AM

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You don't often get email from [annarenewalter@foradvocacy.com](mailto:annarenewalter@foradvocacy.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

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Regards,  
Anna Walter  
9460 N Midway Ave  
Portland, OR 97203

**From:** [Suzi Kelley](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Thursday, August 31, 2023 7:06:47 AM

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You don't often get email from [suzi@grsdelivery.com](mailto:suzi@grsdelivery.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Suzi Kelley  
805 Roxe Dr  
Forest Grove, OR 97116

**From:** [Justine Lowry](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Thursday, August 31, 2023 8:16:26 AM

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Dear Oregon Department of Environmental Quality,

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Regards,  
Justine Lowry  
19693 Aspen Meadows Dr  
Bend, OR 97702

**From:** [Matthew Welch](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Thursday, August 31, 2023 8:20:18 AM

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You don't often get email from [matthew.welch47@sendgrassroots.com](mailto:matthew.welch47@sendgrassroots.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Matthew Welch  
9414 SW 62nd Dr  
Portland, OR 97219

**From:** [colleen Duncan](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Thursday, August 31, 2023 9:01:13 AM

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Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
colleen Duncan  
1142 SE Roberts Ave  
Gresham, OR 97080

**From:** [John Lucachick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Thursday, August 31, 2023 10:13:38 AM

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Dear Oregon Department of Environmental Quality,

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Regards,  
John Lucachick  
1539 NW Iowa Ave  
Bend, OR 97703

**From:** [Madison Blankenship](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Thursday, August 31, 2023 10:43:14 AM

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Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Madison Blankenship  
983 Rio Vista Ave  
Eugene, OR 97404

**From:** [Dawn Elle](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Thursday, August 31, 2023 11:17:51 AM

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You don't often get email from [dgelle71@advocacymessages.com](mailto:dgelle71@advocacymessages.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Dawn Elle  
3653 Park Pl Loop  
Hood River, OR 97031

**From:** [Skyler Lundin](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Thursday, August 31, 2023 11:29:58 AM

---

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Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

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Regards,  
Skyler Lundin  
Albany, OR 97321

**From:** [Ondrea Grey](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Thursday, August 31, 2023 1:08:51 PM

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You don't often get email from [lylabutton468@forgrassroots.com](mailto:lylabutton468@forgrassroots.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Ondrea Grey  
15626 SE Hearthwood Dr  
Clackamas, OR 97015

**From:** [Willa Perlman](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Thursday, August 31, 2023 1:56:49 PM

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Dear Oregon Department of Environmental Quality,

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Regards,  
Willa Perlman  
135 NW 9th Ave Apt 911  
Portland, OR 97209

**From:** [Jess Santos](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Thursday, August 31, 2023 4:07:50 PM

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You don't often get email from [jdossantos003@grsdelivery.com](mailto:jdossantos003@grsdelivery.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Jess Santos  
3101 Main St  
Philomath, OR 97370

**From:** [Derrick schmidt](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Thursday, August 31, 2023 8:23:12 PM

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Dear Oregon Department of Environmental Quality,

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Regards,  
Derrick schmidt  
5957 NW Alfalfa Dr  
Portland, OR 97229

**From:** [Abigail Charbonneau](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Thursday, August 31, 2023 11:15:19 PM

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Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Abigail Charbonneau  
2850 SW 2nd St Apt 605  
Mcminnville, OR 97128

**From:** [Eimaan Khan](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Friday, September 1, 2023 5:07:52 AM

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You don't often get email from [eimaanbkhan@grsdelivery.com](mailto:eimaanbkhan@grsdelivery.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Eimaan Khan  
22929 Rivercrest Dr  
Chiloquin, OR 97624

**From:** [Tiffanie Elek](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Friday, September 1, 2023 6:11:29 AM

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Dear Oregon Department of Environmental Quality,

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Tiffanie Elek  
2136 SW 31st St  
Redmond, OR 97756

**From:** [Chris Olson](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Friday, September 1, 2023 6:15:43 AM

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You don't often get email from [chrisjeffersolson@grassrootsmessage.com](mailto:chrisjeffersolson@grassrootsmessage.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

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Regards,  
Chris Olson  
7805 SW Gearhart Dr  
Beaverton, OR 97007

**From:** [Paulette Nord-Rush](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Friday, September 1, 2023 7:58:59 AM

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You don't often get email from poohrush@grassrootsmessage.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Paulette Nord-Rush  
25295 Wilson River Hwy  
Tillamook, OR 97141

**From:** [Drew Hendle](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Friday, September 1, 2023 8:40:28 AM

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You don't often get email from drewabbey12@grsdelivery.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

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Regards,  
Drew Hendle  
1755 NW Kearney St  
Portland, OR 97209

**From:** [Mary Pritchard](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Friday, September 1, 2023 9:41:27 AM

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You don't often get email from mkpritchard1@advocacymessages.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Mary Pritchard  
2460 Pioneer Pike  
Eugene, OR 97401

**From:** [Steven Tichenor](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Friday, September 1, 2023 11:17:51 AM

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You don't often get email from [steven\\_tichenor@yourconstituent.com](mailto:steven_tichenor@yourconstituent.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Steven Tichenor  
636 Bolt Mountain Rd  
Grants Pass, OR 97527

**From:** [Christine Mulder](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Friday, September 1, 2023 12:35:54 PM

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You don't often get email from [cmmulderdesigns@advocatesmessage.com](mailto:cmmulderdesigns@advocatesmessage.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Christine Mulder  
1510 McKinley Ct  
Eugene, OR 97402

**From:** [Karen Boseke](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Friday, September 1, 2023 2:14:41 PM

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You don't often get email from karenboseke42@advocatesmessage.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Karen Boseke  
3917 Frieda Ave  
Klamath Falls, OR 97603

**From:** [Sally Keller](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Friday, September 1, 2023 3:40:13 PM

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You don't often get email from [sallycbkeller@yourconstituent.com](mailto:sallycbkeller@yourconstituent.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

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most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Sally Keller  
4762 Manzanita St  
Eugene, OR 97405

**From:** [Stella Eastman](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Friday, September 1, 2023 5:08:00 PM

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You don't often get email from stella.eastman@forgrassroots.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

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Regards,  
Stella Eastman  
909 SW 61st Dr  
Portland, OR 97221

**From:** [Barbara Weaver](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Friday, September 1, 2023 6:08:58 PM

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You don't often get email from bkweaver45@yourconstituent.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Barbara Weaver  
10457 SE Cook Ct Apt 262  
Portland, OR 97222

**From:** [Collin Burk](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Friday, September 1, 2023 7:19:21 PM

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You don't often get email from copaceticcaveat@p2a.co. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

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Regards,  
Collin Burk  
12021 SE 34th Ave  
Milwaukie, OR 97222

**From:** [Janet Unruh](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Friday, September 1, 2023 10:29:13 PM

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You don't often get email from unruh.janet@grsdelivery.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Janet Unruh  
16701 NE Glisan St  
Portland, OR 97230

**From:** [Alaina Carrick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Friday, September 1, 2023 10:30:30 PM

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You don't often get email from itisalaina@advocacymessages.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

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Regards,  
Alaina Carrick  
12906 SE Elderberry Dr  
OR 97366

**From:** [Gabby Barber](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Friday, September 1, 2023 11:55:14 PM

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You don't often get email from gabhriel.barber@advocatesmessage.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Gabby Barber  
306 S Ramsey St  
OR 97330

**From:** [Colleen Whalen](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Saturday, September 2, 2023 2:04:09 AM

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You don't often get email from [ironanchor@advocacymessages.com](mailto:ironanchor@advocacymessages.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Colleen Whalen  
1250 Sanford St  
Coos Bay, OR 97420

**From:** [John Chapman](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Saturday, September 2, 2023 5:50:02 AM

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You don't often get email from john.chapman.mi@forgrassroots.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
John Chapman  
252 Grant St  
Ashland, OR 97520

**From:** [Patt Jones](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Saturday, September 2, 2023 6:54:01 AM

---

You don't often get email from patriciajones@p2a.co. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear. We have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts.

Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with low-income households, tribes, and rural communities bearing a disproportionate burden.

Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals.

Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030.

Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short, putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs.

The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.

DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments.

For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent

on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Patt Jones  
Pilot Rock, OR 97868

**From:** [Sky Stevens](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Saturday, September 2, 2023 10:17:28 AM

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You don't often get email from [skystevens1998@sendgrassroots.com](mailto:skystevens1998@sendgrassroots.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Sky Stevens  
4049 SE 114th Ave  
Portland, OR 97266

**From:** [Amy Allison](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Saturday, September 2, 2023 11:15:19 AM

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You don't often get email from boohoobluedog@p2a.co. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Amy Allison  
63902 Bond Ln  
La Grande, OR 97850

**From:** [Megan Busbee](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Saturday, September 2, 2023 12:18:05 PM

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You don't often get email from [meganbusbee@foradvocacy.com](mailto:meganbusbee@foradvocacy.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Megan Busbee  
17986 St Clair Dr  
Lake Oswego, OR 97034

**From:** [Cynthia George](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Saturday, September 2, 2023 12:45:30 PM

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You don't often get email from [goinggreenwest@grassrootsmessage.com](mailto:goinggreenwest@grassrootsmessage.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden. You have allowed the destruction of Oregon's Mid Coast watershed and are incentivized by the ton to increase allowable discharge. Georgia Pacific Mill and Juno is washing garbage with our drinking water supply while under a Declared State of Emergency for Drought by Lincoln County Commissioners yet Georgia Pacific will go around the rules and purchase city water at \$4.50 per 1000 gallons while I pay that for one bottle of Fugi water. You all should lose your positions and the records will support every word.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

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**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION**

IN LINE WITH THE CPP'S DECLINING CAP. All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Cynthia George  
244 Pioneer Trail  
Toledo, OR 97391

**From:** [Lindsay Farnworth](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Saturday, September 2, 2023 12:57:56 PM

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You don't often get email from [lindsay.farnworth@advocacymessages.com](mailto:lindsay.farnworth@advocacymessages.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

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Regards,  
Lindsay Farnworth  
2046 NW Kale Way  
Mcminnville, OR 97128

**From:** [Joseph Shults](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Saturday, September 2, 2023 1:46:48 PM

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You don't often get email from josephshults178@advocacymessages.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

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Regards,  
Joseph Shults  
21 Kenwood Ave  
Medford, OR 97501

**From:** [Bobbi Griffey](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Saturday, September 2, 2023 4:27:05 PM

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You don't often get email from [bobbigriffey@grsdelivery.com](mailto:bobbigriffey@grsdelivery.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Bobbi Griffey  
PO Box 134  
Westlake, OR 97493

**From:** [Arthur Gardener](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Saturday, September 2, 2023 6:16:41 PM

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You don't often get email from [arturogardener@forgrassroots.com](mailto:arturogardener@forgrassroots.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Arthur Gardener  
665 Spyglass Dr  
Eugene, OR 97401

**From:** [Cher Carter](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Saturday, September 2, 2023 7:28:46 PM

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You don't often get email from [cartercher@foradvocacy.com](mailto:cartercher@foradvocacy.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Cher Carter  
1023 Roseburg Rd  
Myrtle Point, OR 97458

**From:** [Kelli Smith](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Saturday, September 2, 2023 8:42:56 PM

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Dear Oregon Department of Environmental Quality,

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Regards,  
Kelli Smith  
676 W Wharton St  
Roseburg, OR 97471

**From:** [Shannon Frank-Richter](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Saturday, September 2, 2023 9:14:51 PM

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You don't often get email from [actress4autism@forgrassroots.com](mailto:actress4autism@forgrassroots.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Shannon Frank-Richter  
19785 Wildwood Dr  
West Linn, OR 97068

**From:** [Taylor Tremain](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Saturday, September 2, 2023 9:53:59 PM

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You don't often get email from [tremaintrain3@sendgrassroots.com](mailto:tremaintrain3@sendgrassroots.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Taylor Tremain  
1555 N Willis Blvd  
Portland, OR 97217

**From:** [geo.schlegel](mailto:geo.schlegel)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Saturday, September 2, 2023 9:55:15 PM

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Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
geo schlegel  
Cloverlawn Dr  
Grants Pass, OR 97527

**From:** [Lynn-Marie Kara](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Saturday, September 2, 2023 10:56:28 PM

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You don't often get email from [lynnmariekara@grassrootsmessage.com](mailto:lynnmariekara@grassrootsmessage.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Lynn-Marie Kara  
7009 N Fiske Ave  
Portland, OR 97203

**From:** [Clark Gail](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Sunday, September 3, 2023 12:01:24 AM

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You don't often get email from gailrclark@yourconstituent.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Clark Gail  
Portland, OR 97232

**From:** [Jackie Dalke](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Sunday, September 3, 2023 12:24:59 AM

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You don't often get email from [jxdlk.20@advocacymessages.com](mailto:jxdlk.20@advocacymessages.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Jackie Dalke  
Grants Pass, OR 97526

**From:** [june Najera](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Sunday, September 3, 2023 6:58:42 AM

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You don't often get email from [june.najera388@grsdelivery.com](mailto:june.najera388@grsdelivery.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
June Najera  
12150 SW Keas Ct  
Beaverton, OR 97008

**From:** [David Mixon](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Sunday, September 3, 2023 7:18:37 AM

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You don't often get email from davemixon1949@advocatesmessage.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
David Mixon  
27595 Snyder Rd  
Junction City, OR 97448

**From:** [Jamie Shields](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Sunday, September 3, 2023 8:42:01 AM

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You don't often get email from [jfillmore66@grsdelivery.com](mailto:jfillmore66@grsdelivery.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

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Regards,  
Jamie Shields  
15739 NW Rondos Dr  
Portland, OR 97229

**From:** [Mary Pritchard](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Sunday, September 3, 2023 9:51:27 AM

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You don't often get email from mkpritchard1@p2a.co. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Mary Pritchard  
2460 Pioneer Pike  
Eugene, OR 97401

**From:** [Jennifer Elder](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Sunday, September 3, 2023 10:35:11 AM

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You don't often get email from aeejennifer@foradvocacy.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

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Regards,  
Jennifer Elder  
10620 NW Skyline Blvd  
Portland, OR 97231

**From:** [Erin Copley](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Sunday, September 3, 2023 11:10:51 AM

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You don't often get email from [erin.copley.msw@forgrassroots.com](mailto:erin.copley.msw@forgrassroots.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Erin Copley  
6814 N Mississippi Ave  
Portland, OR 97217

**From:** [Lee Taylor](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Sunday, September 3, 2023 12:05:48 PM

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You don't often get email from kaaawamoon@forgrassroots.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

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Regards,  
Lee Taylor  
8747 SW Brightfield Cir  
Portland, OR 97223

**From:** [John Limb](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Climate Protection Program  
**Date:** Sunday, September 3, 2023 1:59:46 PM

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I am concerned to hear that the Rule making Advisory Committee that was establish to further the Climate Protection Program was so heavily composed and influenced by members of the energy industry, with minimal input from environmental groups. And, as would be expected, the resulting rules fall far short on what is required to protect our environment. In particular, the term " best available emissions reduction technology" seems to leave the "Barn Door Open" for allowing corporation to be excused from any serious attempt at methane or carbon dioxide reduction. Please address the short comings of the Advisory committee.

John Limb

Jackson County

**From:** [Arthur Gardener](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Sunday, September 3, 2023 5:22:48 PM

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You don't often get email from [arturogardener@p2a.co](mailto:arturogardener@p2a.co). [Learn why this is important](#)

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**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Arthur Gardener  
665 Spyglass Dr  
Eugene, OR 97401

**From:** [sophia field](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Sunday, September 3, 2023 5:32:09 PM

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You don't often get email from safield04@grsdelivery.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

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Regards,  
sophia field  
3333 SE Cesar E Chavez Blvd Apt 40  
Portland, OR 97202

**From:** [Dave King](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Sunday, September 3, 2023 5:55:28 PM

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You don't often get email from [landd\\_2@foradvocacy.com](mailto:landd_2@foradvocacy.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Dave King  
8716 N Edison St  
Portland, OR 97203

**From:** [Sandra Roth](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Sunday, September 3, 2023 7:19:57 PM

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You don't often get email from [sdroth1132@grassrootsmessage.com](mailto:sdroth1132@grassrootsmessage.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Sandra Roth  
1235 SW 14th Ave  
Albany, OR 97321

**From:** [John Hawksley](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Sunday, September 3, 2023 11:26:46 PM

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You don't often get email from [golihawk@p2a.co](mailto:golihawk@p2a.co). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
John Hawksley  
1230 Ashland Mine Rd  
Ashland, OR 97520

**From:** [Danna Rubesh](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 4, 2023 12:52:47 AM

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You don't often get email from [danna.rubesh@grassrootsmessage.com](mailto:danna.rubesh@grassrootsmessage.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Danna Rubesh  
8672 NE Delamere Way  
Beaverton, OR 97006

**From:** [Carol Stout](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 4, 2023 4:51:05 AM

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Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Carol Stout  
51386 Huntington Rd Unit 2  
La Pine, OR 97739

**From:** [Rachel Jensen](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 4, 2023 7:56:22 AM

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You don't often get email from [rachelm.jensen1@advocatesmessage.com](mailto:rachelm.jensen1@advocatesmessage.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Rachel Jensen  
7334 N Oatman Ave  
Portland, OR 97217

**From:** [Maureen Lugar](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 4, 2023 8:47:01 AM

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You don't often get email from [jmlugar13@yourconstituent.com](mailto:jmlugar13@yourconstituent.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Maureen Lugar  
65373 Old Bend Redmond Hwy  
Bend, OR 97703

**From:** [Maddi Fronsoe](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 4, 2023 9:29:33 AM

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You don't often get email from maddi.miller16@grassrootsmessage.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

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Regards,  
Maddi Fronsoe  
12029 SW Tualatin Rd  
Tualatin, OR 97062

**From:** [June Najera](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 4, 2023 9:51:44 AM

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You don't often get email from [june.najera388@forgrassroots.com](mailto:june.najera388@forgrassroots.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
June Najera  
12150 SW Keas Ct  
Beaverton, OR 97008

**From:** [Rose Lee](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 4, 2023 11:13:47 AM

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You don't often get email from [akrml1959@sendgrassroots.com](mailto:akrml1959@sendgrassroots.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Rose Lee  
1225 SW Alder St  
Portland, OR 97205

**From:** [Linda Rudnick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 4, 2023 2:01:50 PM

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You don't often get email from lindajrudnick@advocacymessages.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Linda Rudnick  
5500 SW 152nd Ave  
Beaverton, OR 97007

**From:** [Jo Alcazar](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 4, 2023 2:54:55 PM

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You don't often get email from joannpaasch1946@grassrootsmessage.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

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Regards,  
Jo Alcazar  
970 W Juniper Ave  
Hermiston, OR 97838

**From:** [Nancy Marshall](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 4, 2023 3:05:55 PM

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You don't often get email from nancym97213@advocacymessages.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Nancy Marshall  
2002 NE 64th Ave  
Portland, OR 97213

**From:** [Carol Savonen](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 4, 2023 10:10:48 PM

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You don't often get email from carol.savonen@foradvocacy.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Carol Savonen  
33287 Iris Cir  
Philomath, OR 97370

**From:** [alex west](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 4, 2023 11:09:59 PM

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You don't often get email from [angrypixie@p2a.co](mailto:angrypixie@p2a.co). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

ODF consistently fails to pander to the logging corporations, ignoring how climate change diminishes forest health and ability to evolve regrowth.

The "working forest" jargon is an excuse to continue unmitigated clearcuts. OR forests are finite!

Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

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Regards,  
alex west  
2509 5th St  
Tillamook, OR 97141

**From:** [Carol Hampton](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, September 5, 2023 5:55:13 AM

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You don't often get email from hhampton3@forgrassroots.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Carol Hampton  
60830 Falcon Pointe Ln  
Bend, OR 97702

**From:** [Laurie Rutenberg](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, September 5, 2023 6:13:54 AM

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You don't often get email from [laurie.rutenberg@grassrootsmessage.com](mailto:laurie.rutenberg@grassrootsmessage.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

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Regards,  
Laurie Rutenberg  
10701 SW 25th Ave  
Portland, OR 97219

**From:** [Mia Marquez](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, September 5, 2023 8:17:26 AM

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Regards,  
Mia Marquez  
4703 NE 90th Ave  
Portland, OR 97220

**From:** [Kathryn Gray](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, September 5, 2023 8:53:23 AM

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You don't often get email from [kathrynkeenangray@foradvocacy.com](mailto:kathrynkeenangray@foradvocacy.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Kathryn Gray  
40444 McDowell Creek Dr  
Lebanon, OR 97355

**From:** [Dave King](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, September 5, 2023 10:26:52 AM

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You don't often get email from [landd\\_2@advocatesmessage.com](mailto:landd_2@advocatesmessage.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

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Regards,  
Dave King  
8716 N Edison St  
Portland, OR 97203

**From:** [Kara Chanasyk](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Tuesday, September 5, 2023 12:41:35 PM

---

[You don't often get email from kara.chanasyk@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Hello,

I am writing as a concerned Oregon citizen. DEQ's current proposed Climate rules do not effectively align with the CPP, Oregon's cornerstone Climate Protection Program.

This program is essential to achieving our state's climate pollution reduction goals. As you recall, it was adopted with overwhelming public support following an extensive 18-month rulemaking and stakeholder engagement process.

My requests, as a citizen of Oregon and this mother Earth

DEQ should amend the proposed rules by:

- 1) Restricting biomethane used for CPP compliance to that which produces direct benefits for Oregonians; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Respectfully,  
Kara Chanasyk  
5817 NE Sumner St, Portland, OR 97218

**From:** [Alex Yust](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Public comment for proposed rules  
**Date:** Tuesday, September 5, 2023 12:42:31 PM

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Hello,

Please amend the rules to disallow out of state investments to qualify as emission reduction credits. All emission reductions or credits should be from in-state investments only.

Thank you

**From:** [Chen Reeder](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, September 5, 2023 3:30:11 PM

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You don't often get email from [asosu.sustainability@grassrootsmessage.com](mailto:asosu.sustainability@grassrootsmessage.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Chen Reeder  
303 NW 31st St  
Corvallis, OR 97330

**From:** [John Arnold](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, September 5, 2023 4:50:25 PM

---

You don't often get email from bhava9@grassrootsmessage.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

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Regards,  
John Arnold  
6229 N Montana Ave  
Portland, OR 97217

**From:** [Theman Manne](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, September 5, 2023 6:08:00 PM

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**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Theman Manne  
Dunes City, OR 97439

**From:** [Melinda Hendley](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, September 5, 2023 10:14:02 PM

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You don't often get email from [hendleysmith@grassrootsmessage.com](mailto:hendleysmith@grassrootsmessage.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Melinda Hendley  
9355 SW Jasper Dr  
Beaverton, OR 97007

**From:** [Laura Ladd](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, September 5, 2023 11:27:31 PM

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You don't often get email from [lauraandmarda@p2a.co](mailto:lauraandmarda@p2a.co). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Laura Ladd  
5060 Barnes Ct SE  
Salem, OR 97306

**From:** [Grace Donnelly](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Wednesday, September 6, 2023 1:40:17 AM

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You don't often get email from [gracedonnelly2001@grsdelivery.com](mailto:gracedonnelly2001@grsdelivery.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Grace Donnelly  
3294 Cheltenham Wy  
Medford, OR 97504

**From:** [Jennifer Hall](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Wednesday, September 6, 2023 6:35:15 AM

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You don't often get email from shallow60@advocatesmessage.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Please strengthen, not weaken the Climate Protection Program (CPP). The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Jennifer Hall  
412 W Myrtlewood Ct  
Roseburg, OR 97471

**From:** [Matthew Patton](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Wednesday, September 6, 2023 6:59:28 AM

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You don't often get email from [legotiger27@foradvocacy.com](mailto:legotiger27@foradvocacy.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Matthew Patton  
1657 NW John Fremont St  
Bend, OR 97703

**From:** [Isa Mays](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Wednesday, September 6, 2023 8:24:29 AM

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You don't often get email from madchenisa@p2a.co. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Isa Mays  
44595 SE Coalman Rd  
Sandy, OR 97055

**From:** [Kimmi Lanee](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Wednesday, September 6, 2023 11:58:49 AM

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You don't often get email from [hssstroke.activist87@advocatesmessage.com](mailto:hssstroke.activist87@advocatesmessage.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Kimmi Lane'  
217 SE Lacreole Dr  
Dallas, OR 97338

**From:** [Brandon Bostick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Wednesday, September 6, 2023 2:08:02 PM

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You don't often get email from [brandonjbostick@sendgrassroots.com](mailto:brandonjbostick@sendgrassroots.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Brandon Bostick  
275 NE Mill St  
Dufur, OR 97021

**From:** [Phillip Triplett](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Wednesday, September 6, 2023 5:10:48 PM

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You don't often get email from [triplettvendetta@sendgrassroots.com](mailto:triplettvendetta@sendgrassroots.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

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Regards,  
Phillip Triplett  
28 N Jefferson St  
Eugene, OR 97402

**From:** [Brenda Hoard](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Thursday, September 7, 2023 2:05:00 AM

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You don't often get email from [kurious098@grassrootsmessage.com](mailto:kurious098@grassrootsmessage.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Brenda Hoard  
4130 Silverton Rd NE  
Salem, OR 97305

**From:** [Caelon Vecchio-Miller](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Thursday, September 7, 2023 6:37:24 AM

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You don't often get email from [tinygigglescvn@yourconstituent.com](mailto:tinygigglescvn@yourconstituent.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Caelon Vecchio-Miller  
58 Lynnbrook Dr  
Eugene, OR 97404

**From:** [Dee Hochhalter](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Thursday, September 7, 2023 10:03:34 AM

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You don't often get email from chareleen@sendgrassroots.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

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Regards,  
Dee Hochhalter  
3306 S Pacific Hwy  
Medford, OR 97501

**From:** [Shane Valle](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Comments to DEQ about proposed CPP rule making  
**Date:** Thursday, September 7, 2023 10:14:39 AM

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You don't often get email from shane.valle@gmail.com. [Learn why this is important](#)

Please amend the rules such that fossil fuel emitters in Oregon do not have carbon offsets located in places other than Oregon as an "out".

Three reasons the rules pertaining to this work against Oregonians and a more sustainable future:

1. This will remove money from the state-wide climate fund and job opportunities for Oregonians to help move our state to a greener energy future;
2. continuing to allow fossil fuel emitters to emit in perpetuity will slow the transition of other parts of our current carbon-intensive system, such as home heating and cooking;
3. carbon offsets can often be of dubious quality and longevity and they are out of Oregon state's ability to guarantee or influence if they are outside our boundaries.

The options before you are whether we want our move to a greener future to work best for Oregonians or work best for companies that don't have any particular love for our state, just making money in it. I hope you'll move to support the version of the rules that supports cleaner air, better environmental behavior, and new job opportunities right here at home instead of allowing fossil fuel companies to kick the can down the road on making a shift that is a long time coming.

Thank you for your time and consideration.

--

**Shane Valle**

**From:** [Suzy Blanchard](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Thursday, September 7, 2023 10:21:07 AM

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You don't often get email from srauzsong8827@forgrassroots.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Suzy Blanchard  
8827 SE Taylor St  
Portland, OR 97216

**From:** [Katherine Teas](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Thursday, September 7, 2023 12:02:15 PM

---

You don't often get email from [teaskatherine@advocacymessages.com](mailto:teaskatherine@advocacymessages.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Katherine Teas  
11300 Wilson River Hwy  
Tillamook, OR 97141

**From:** [Jeff Jefferson](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Thursday, September 7, 2023 12:47:10 PM

---

You don't often get email from jeff@grsdelivery.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

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Regards,  
Jeff Jefferson  
Portland, OR 97268

**From:** [Kaden Howard-Liu](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Thursday, September 7, 2023 3:03:59 PM

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You don't often get email from [kadentai09@forgrassroots.com](mailto:kadentai09@forgrassroots.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Kaden Howard-Liu  
923 NW Donna Dr  
Grants Pass, OR 97526

**From:** [Barbara Weaver](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Thursday, September 7, 2023 5:53:48 PM

---

You don't often get email from bkweaver45@advocatefor.me. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

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Regards,  
Barbara Weaver  
10457 SE Cook Ct Apt 262  
Portland, OR 97222

**From:** [Evan Salbego](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Thursday, September 7, 2023 6:28:08 PM

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You don't often get email from [evan.salbego@grassrootsmessage.com](mailto:evan.salbego@grassrootsmessage.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Evan Salbego  
5166 SW Kara Ave  
Corvallis, OR 97333

**From:** [Suzy Blanchard](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Thursday, September 7, 2023 6:52:41 PM

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You don't often get email from srauzsong8827@forgrassroots.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

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Regards,  
Suzy Blanchard  
8827 SE Taylor St  
Portland, OR 97216

**From:** [Elyce Benham](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Thursday, September 7, 2023 7:20:16 PM

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You don't often get email from [elyce.benham@grsdelivery.com](mailto:elyce.benham@grsdelivery.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Elyce Benham  
5216 N Gay Ave  
Portland, OR 97217

**From:** [Pam Judy](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Thursday, September 7, 2023 7:27:23 PM

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You don't often get email from [pjudy22@foradvocacy.com](mailto:pjudy22@foradvocacy.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Pam Judy  
1338 N Maple St  
Canby, OR 97013

**From:** [Chrizma Hosler](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Thursday, September 7, 2023 7:47:56 PM

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You don't often get email from [chrizmahosler@forgrassroots.com](mailto:chrizmahosler@forgrassroots.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Chrizma Hosler  
Albany, OR 97321

**From:** [Felicity cordeiro](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Friday, September 8, 2023 1:29:16 AM

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You don't often get email from [gildasfamilyfarm@yourconstituent.com](mailto:gildasfamilyfarm@yourconstituent.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Felicity cordeiro  
PO Box 2324  
Cave Junction, OR 97523

**From:** [Mary Ames](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Friday, September 8, 2023 6:05:44 AM

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You don't often get email from amesm86@yourconstituent.com. [Learn why this is important](#)

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**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Mary Ames  
12121 SW 60th Ave  
Portland, OR 97219

**From:** [Paulette Nord-Rush](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Friday, September 8, 2023 6:29:49 AM

---

You don't often get email from poohrush@sendgrassroots.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Paulette Nord-Rush  
25295 Wilson River Hwy  
Tillamook, OR 97141

**From:** [Taran Nadler](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Friday, September 8, 2023 8:22:46 AM

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You don't often get email from tarandactyl@gmail.com. [Learn why this is important](#)

To whom it may concern,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from anthropogenic carbon sources does not comply with the CPP.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic

development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

**From:** [Rebecca Maloney](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 climate rule making  
**Date:** Friday, September 8, 2023 8:59:24 AM

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[You don't often get email from cedarnd@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

I'm keeping this short and sweet:

Strengthen the CPP rules! The wildfires, storms, flooding are proof that we need to act now!

Rebecca Maloney, 97206

Sent from my iPhone

**From:** [N Sagrillo](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Friday, September 8, 2023 9:08:55 AM

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You don't often get email from mylove92115@sendgrassroots.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
N Sagrillo  
4075 Aerial Way Apt 200  
Eugene, OR 97402

**From:** [Inga Fisher Williams](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 DEQ Climate rule making  
**Date:** Friday, September 8, 2023 9:58:25 AM

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You don't often get email from ifisherw@gmail.com. [Learn why this is important](#)

After a long DEQ process with much public engagement to develop a climate action program, I urge you to stay the course and ensure that the Oregon Climate Protection Program stays on track to achieve its climate goals and deliver public health, economic, and job benefits for Oregon communities.

Given the many climate crises manifestations just this year alone (2023), it is NOT the moment to weaken standards

Specifically, it is vital that DEQ strengthen its [current proposed rules](#) by:

1. Restricting biomethane (aka renewable natural gas (RNG) and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians.
2. Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction (BAER) program.

**We count on the DEQ to fulfill its mandate to deliver for Oregon to achieve our climate action goals!**

Inga FishervWilliams  
5858 S Riveridge Lane #15  
Portland, Oregon 97239

**From:** [Mary Pritchard](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Friday, September 8, 2023 10:04:46 AM

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You don't often get email from mkpritchard1@forgrassroots.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Mary Pritchard  
2460 Pioneer Pike  
Eugene, OR 97401

**From:** [Thor Hinckley](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** "2023" Climate Rulemaking  
**Date:** Friday, September 8, 2023 11:08:50 AM

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You don't often get email from [thorhinckley53@gmail.com](mailto:thorhinckley53@gmail.com). [Learn why this is important](#)

Dear Chair George, Vice Chair Baraso, members of the Commission; and DEQ staff,

My name is Thor Hinckley, in addition to being the Transportation Electrification Consultant for Solar Energy Trade Shows Inc., I also serve as a member of the Oregon Third Act Steering Committee, Portland First Unitarian Church's Center for Earth Committee and the Metro Climate Action Team. In my professional career, I formerly served as Manager of PGE's Renewable Power Program, which is still ranked 1st in the nation for total number of customers.

I want to thank you for the opportunity to provide comments today on DEQ's 2023 climate rulemaking. As DEQ staff knows, this rulemaking will have major consequences for the climate and the communities in Oregon going forward.

By including guardrails and pathways for regulated entities to comply with Oregon's Climate Protection Program, this program will be vital to ensuring our state stays on track to achieve important climate goals, and deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, with the broad scope of issues and laws touched by this proceeding, there could very well be some unintended consequences if impacts to communities and the climate are not sufficiently considered.

I am very concerned that DEQ's current proposed rules would effectively undermine the CPP, a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive rulemaking and stakeholder engagement process.

I am very concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon.

This would undermine the integrity of the CPP, and the current proposed rule amendments will severely compromise the program's public health, economic, and employment goals, as well as hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians in Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

In addition, I strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from anthropogenic carbon sources does *not* comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits—ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Thor Hinckley

[Thor Hinckley](#)

*Nationally recognized leader - e-mobility, renewables and climate-tech*

**From:** [Andrew Merrell](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Friday, September 8, 2023 11:11:44 AM

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You don't often get email from [andrew.merrell@p2a.co](mailto:andrew.merrell@p2a.co). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

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**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Andrew Merrell  
4775 SW Pacific Ave  
Beaverton, OR 97005

**From:** [David Parker](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Friday, September 8, 2023 11:33:20 AM

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You don't often get email from david.bodhi@gmail.com. [Learn why this is important](#)

- I am a grandfather and I want to leave a livable planet to my grandchildren and all the unborn people for generations to come. This must be foremost in our minds and hearts.
- I am concerned that DEQ's current proposed rules would effectively undermine the CPP— a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.
- Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon.
- By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.
- I therefore strongly urge DEQ to amend the proposed rules by:
  - 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians; and
  -

2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

- I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from anthropogenic carbon sources does *not* comply with the CPP.

Thank you for acting on behalf of humanity,

David C Parker

1953 SE 20th Ave

Portland, OR

503 236-0967

**From:** [Sierra Spencer](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Friday, September 8, 2023 12:17:33 PM

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You don't often get email from [elvengirl81@advocatefor.me](mailto:elvengirl81@advocatefor.me). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Sierra Spencer  
726 N Dean St  
Coquille, OR 97423

**From:** [Lenny Dee](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Climate Protection Plan  
**Date:** Friday, September 8, 2023 1:15:41 PM

---

You don't often get email from [lenny@onwardoregon.org](mailto:lenny@onwardoregon.org). [Learn why this is important](#)

Hi,

DEQ must ensure the Climate Protection Program stays on track to achieve its climate goals and deliver public health, economic, and job benefits for Oregon communities. Specifically, it is vital that DEQ strengthen its [current proposed rules](#) by:

1. Restricting biomethane (aka renewable natural gas (RNG) and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians.
2. Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction (BAER) program.

Lenny Dee  
Onward Oregon  
Your Oregon Information Source  
<https://onwardoregon.org/>

**From:** [Joseph Stenger](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 DEQ climate rulemaking regarding CPP  
**Date:** Friday, September 8, 2023 1:47:24 PM

---

You don't often get email from joseph.stenger@gmail.com. [Learn why this is important](#)

Dear EQC Chair George, Vice Chair Baraso, members of the Commission and DEQ staff:

My name is Joseph Stenger. I am a resident of NE Portland, a grandfather, a family physician, and a citizen with huge concerns about the rapidly increasing calamities due to the deterioration of our climate.

Thank you for the chance to give comments today on DEQ's 2023 climate rulemaking. This rulemaking will affect the future for our children and grandchildren and beyond. It is crucial to get this right, based on the well-known rising level of threat. Every governmental entity should be prioritizing a rapid transition to a clean-energy economy.

This rulemaking is the time to be sure that Oregon is on track to meet the climate targets set out by the Global Warming Commission. Ensuring that regulated entities comply with our Climate Protection Program (CPP) will provide huge cost-saving benefits to public health and create clean jobs and economic vitality. These benefits should be specifically most targeted to communities that historically have suffered the worst environmental damage, such as the Cully neighborhood near where I live. Given the broad scope of issues and laws affected by this rulemaking, there will be deep consequences if the rules do not seriously address impacts to these communities and the climate.

Large corporations that have amassed huge wealth from the sale of dangerous fossil-fuels, while suppressing information about those dangers, must be held to account for their role in converting to a clean-energy future. They should no longer be given allowances that will delay that conversion. Any new stationary source or any proposed modification that has the potential to emit GHGs in any quantity should complete a BAER assessment prior to construction.

DEQ's current proposed rules could undermine the CPP— a program that is absolutely essential to achieving our state's climate pollution

reduction goals, a program that was adopted with overwhelming public support following an extensive 18-month rulemaking and stakeholder engagement process. There already is significant leeway in compliance to protect utilities.

Specifically, I am concerned that the current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

I ask you to amend the proposed rules as follows:

- 1) Restrict biomethane (RNG) and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians; and
- 2) Strengthen emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Synthetic methane derived from anthropogenic carbon sources does *not* comply with the CPP. I strongly support maintaining protective restrictions on biomethane accounting to that effect in the current rules where they already exist. We also do not want to allow investments to be diverted from the Community Climate Investment (CCI) program.

Doing this will help ensure that Oregon stays on track to achieve our climate goals, and will maximize the resulting job creation, cost saving, public health, and economic development benefits—ensuring that they benefit Oregon communities, rather than those out-of-state.

I appreciate the opportunity to provide comments. I trust that you will make the best choices for all present and future Oregonians.

Joseph Stenger MD

**From:** [Zigbee Zignew](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Friday, September 8, 2023 4:32:07 PM

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You don't often get email from zigbee@zigbee.com. [Learn why this is important](#)

Dear Commissioners,

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that the Department of Environmental Quality (DEQ)'s draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. For the CPP to deliver, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision-making.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions.. Best Available Emissions Reduction (BAER) assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Thank you for your consideration,

Sincerely,  
Zigbee Zignew  
2222 Zigbee Lane  
Seattle, WA 98101

**From:** [Randy Knop](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Friday, September 8, 2023 4:56:30 PM

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You don't often get email from rknop@eoni.com. [Learn why this is important](#)

Dear Commissioners,

The New DEQ program purports to reduce greenhouse gas emissions in Oregon by 90% by 2050. The Oregon Environmental Quality Commission voted 3-1 to establish the Climate Protection Program which sets enforceable limits on greenhouse gas emissions from fossil fuels used throughout Oregon.

An admirable program were it actually able to deliver on its promises.

What is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon can lead or it can follow a path of least resistance as its current program is inadequate to meet the stated goals. DEQ has not done enough to lock in the pollution reductions that science knows are needed to achieve these critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030.

Without additional policies and programs in place to slash these dangerous pollutants including greenhouse gas emissions, Oregon will continue to fall short – putting our lives and future generations at increased risk of defaulting with their lives.

We need to increase our climate ambition, and we can't afford to miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) is only the third regulation of its kind in the nation to place an enforceable, declining cap on climate-harming pollution from transportation and natural gas usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

Sincerely,  
Randy Knop  
1038 S 4th St  
Union, OR 97883

**From:** [Carlyn Mitas](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Friday, September 8, 2023 8:55:44 PM

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Dear Commissioners,

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that the Department of Environmental Quality (DEQ)'s draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. For the CPP to deliver, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. Hydrogen is a leak-prone gas, and the risks of hydrogen leakage must be incorporated into our decision-making.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Best Available Emissions Reduction (BAER) assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Thank you for your consideration,

Sincerely,  
Carlyn Mitas  
33500SE Stevens Road  
Corbett, OR 97019

**From:** [Kristina DiTullo](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Saturday, September 9, 2023 7:25:03 AM

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You don't often get email from kbd@kristinabellditullo.com. [Learn why this is important](#)

Dear Commissioners,

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Thank you for your consideration,

Sincerely,  
Kristina DiTullo  
4706 SE 32nd Ave  
Portland, OR 97202

**From:** [Dennis Chase](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Saturday, September 9, 2023 8:14:18 AM

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You don't often get email from [dcmeridian@advocatefor.me](mailto:dcmeridian@advocatefor.me). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Dennis Chase  
90449 Sunderman Rd  
Springfield, OR 97478

**From:** [Paula Latasa](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Saturday, September 9, 2023 8:28:09 AM

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You don't often get email from oilytransformation@sendgrassroots.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Paula Latasa  
65180 78th St  
Bend, OR 97703

**From:** [Mariarose Shanahe](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Saturday, September 9, 2023 8:58:42 AM

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Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Marianrose Shanahe  
730 NW Kinney St  
Grants Pass, OR 97526

**From:** [350EUG Coordinator](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking testimony  
**Date:** Saturday, September 9, 2023 11:59:25 AM  
**Attachments:** [DEQ rulemaking comment 350.doc](#)

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Please accept and consider this testimony from 350 Eugene.

Thank you for your continued work on behalf of Oregonians.  
Linda Kelley  
350 Eugene

**From:** [Jeff Weitzel](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Saturday, September 9, 2023 1:45:37 PM

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You don't often get email from evil.jeff.weitzel@gmail.com. [Learn why this is important](#)

Dear Environmental Quality Commission and DEQ staff,

I appreciate the opportunity to provide comment today on DEQ's 2023 climate rulemaking. As you well know, the specifics of these rules will have far-reaching consequences for the climate, and for the health and well-being of communities throughout Oregon.

As a resident of Tillamook county who is concerned both about the worsening extreme weather, flooding, and fires induced by climate change, and about public health and environmental justice, I am concerned that the [current proposed rules](#) undermine the goals of the Climate Protection Program and would have damaging unintended consequences for communities across Oregon.

I therefore strongly urge DEQ to amend the proposed rules by:

**1) Eliminating the option to use out of state biomethane or hydrogen for CPP compliance.** Biomethane and hydrogen are themselves problematic because of leakage, NOx pollution when combusted, and pollution from production, and if used at all should be vetted carefully for direct benefits for Oregonians. Reliance on out-of-state biomethane would likely have the additional adverse effect of investments being diverted from the Community Climate Investment (CCI) program.

**2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.** The CPP is the only existing state regulation on major industrial emitters. Therefore it is vital that its rules create both public health and equity improvements, and actual emissions reductions from existing stationary sources. New stationary sources of pollution should be deterred.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from anthropogenic carbon sources does *not* comply with the CPP.

These amendments and safeguards will help ensure that Oregon stays on track to achieve our climate goals, at the same time as stimulating job creation, cost saving, public health, and economic development benefits. Let's ensure the new rules benefit Oregon communities.

Thank you for considering my comments.

Jeffrey Weitzel  
Neskowin, Oregon

**From:** [Teresa Cohoon](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Saturday, September 9, 2023 1:55:25 PM

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You don't often get email from [ionizer.granule\\_0v@grsdelivery.com](mailto:ionizer.granule_0v@grsdelivery.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

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Regards,  
Teresa Cohoon  
555 Valley View Dr  
Medford, OR 97504

**From:** [Soph S.](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Saturday, September 9, 2023 2:21:25 PM

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You don't often get email from [sophscovile@advocatesmessage.com](mailto:sophscovile@advocatesmessage.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Soph S.  
Ashland, OR 97520

**From:** [Rosanne Lewis](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Saturday, September 9, 2023 3:10:32 PM

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You don't often get email from [i2amrosanne@yourconstituent.com](mailto:i2amrosanne@yourconstituent.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

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Regards,  
Rosanne Lewis  
3027 Adams Cir  
Medford, OR 97504

**From:** [Bette Prickett](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Saturday, September 9, 2023 9:15:01 PM

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You don't often get email from [bjprickett71@advocatesmessage.com](mailto:bjprickett71@advocatesmessage.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Bette Prickett  
44201 NW Elk Mountain Rd  
Banks, OR 97106

**From:** [Valeria McWilliams](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Saturday, September 9, 2023 9:27:47 PM

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You don't often get email from [valeriamcwilliams@gmail.com](mailto:valeriamcwilliams@gmail.com). [Learn why this is important](#)

- Good evening, I'd like to submit testimony on DEQ's 2023 climate rulemaking.
- I am concerned that DEQ's current proposed rules would effectively undermine the CPP— a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.
- Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon.
- By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.
- I therefore strongly urge DEQ to amend the proposed rules by:
  - 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians; and
  - 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.
  - I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from anthropogenic carbon sources does *not* comply with the CPP.
  -

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits— ensuring that they benefit Oregon communities, and are not exported out of state.

◦

Thank you for the opportunity to provide comments.

- Valeria McWilliams

**From:** [Sahasini Gavarshetty](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Saturday, September 9, 2023 11:15:40 PM

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You don't often get email from [sahasini.cg@advocatefor.me](mailto:sahasini.cg@advocatefor.me). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Suhasini Gavarshetty  
Portland, OR 97209

**From:** [Susan Palmiter](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Sunday, September 10, 2023 8:07:40 AM

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Climate change and devastation is here. We see it around the world and in Oregon - affecting farmers, ranchers, fishing industry folks, and every day people. It is critical that Oregon do what it can to reduce carbon emissions. My faith demands that I work to protect all living things.

The Climate Protection Program is to provide benefits to local communities. Please adopt rules that maximize benefits to Oregonians. Specifically, it is vital that DEQ strengthen its current proposed rules by 1) Restricting biomethane (aka renewable natural gas (RNG) and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians. and 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction (BAER) program.

Thank you.  
Susan Palmiter  
Portland, Oregon

--

Susan Palmiter  
[503-705-9144](tel:503-705-9144) (cell)

"Changing the world is a joyful and fulfilling process and we let that show." Sunrise Movement

**From:** [Kathaleen Parker](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Sunday, September 10, 2023 8:51:09 AM

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You don't often get email from [parker.kathaleen@foradvocacy.com](mailto:parker.kathaleen@foradvocacy.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

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Regards,  
Kathaleen Parker  
4462 Kurth St S  
Salem, OR 97302

**From:** [Aurora Eklund](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Sunday, September 10, 2023 9:33:02 AM

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You don't often get email from [auroraclair11@advocatefor.me](mailto:auroraclair11@advocatefor.me). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Aurora Eklund  
3232 NE Liberty Ct  
Portland, OR 97211

**From:** [Mary Pritchard](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Sunday, September 10, 2023 10:24:21 AM

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You don't often get email from mkpritchard1@foradvocacy.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

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Regards,  
Mary Pritchard  
2460 Pioneer Pike  
Eugene, OR 97401

**From:** [Amanda Duncan](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Sunday, September 10, 2023 6:44:15 PM

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You don't often get email from [ajwduncan@gmail.com](mailto:ajwduncan@gmail.com). [Learn why this is important](#)

Hi,

I'm a long-time Oregon resident and a member of Climate Reality PDX. I am writing to encourage stronger support of the Climate Protection Program (CPP) by modifying the current proposed climate rules to restrict biomethane used for CPP compliance to that which provides direct benefits for Oregonians and to strengthen emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program. The CPP already provides gas utilities with significant flexibility and cost constraints to comply, and increasing emissions from industrial sites threaten Oregon's ability to meet its climate goals. These modifications in the proposed rules will help keep the state's emission reductions on track and maximize public health and economic benefits for Oregonians.

Thank you.

Amanda Duncan, PhD  
Beaverton, Oregon

**From:** [Hope Anderson](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Sunday, September 10, 2023 7:03:15 PM

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You don't often get email from myachenass11@grsdelivery.com. [Learn why this is important](#)

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**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Hope Anderson  
34155 El Roble Ave  
Eugene, OR 97405

**From:** [Val Tuross](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Sunday, September 10, 2023 7:20:10 PM

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You don't often get email from [valerielawrence94@advocatesmessage.com](mailto:valerielawrence94@advocatesmessage.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Val Tuross  
910 Talent Ave  
Talent, OR 97540

**From:** [Lee Curran](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Sunday, September 10, 2023 9:21:11 PM

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You don't often get email from [dflcurran@foradvocacy.com](mailto:dflcurran@foradvocacy.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Lee Curran  
9109 St Andrews Cir  
Klamath Falls, OR 97603

**From:** [Dennis Chase](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Sunday, September 10, 2023 9:33:34 PM

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You don't often get email from [dcmeridian@grsdelivery.com](mailto:dcmeridian@grsdelivery.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Dennis Chase  
90449 Sunderman Rd  
Springfield, OR 97478

**From:** [Amanda Thorn](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 11, 2023 7:30:02 AM

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You don't often get email from a.mattern@advocacymessages.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Amanda Thorn  
5170 SW Elm Ave  
Beaverton, OR 97005

**From:** [Bill Harris](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Monday, September 11, 2023 11:31:27 AM

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You don't often get email from bbharris1936@gmail.com. [Learn why this is important](#)

Chair George, Vice-Chair Baraso, DEQ staff and members of the Commission  
I am Bill Harris. I am an active member of several citizen groups seeking climate solutions. The DEQ effort and actions over many months encouraged me as I watched, and occasionally contributed testimony to development of the TPP program. This program can be a major portion of the Oregon actions that cause reduction in OUR SHARE of GHG and in a manner which invests in reversing climate change problems in impacted communities. The program gives fuel suppliers who choose not to meet their assigned limit of distribution the opportunity to make Community Climate Investments. CCI's invest in weatherization, installation of electric heating, promotion of electric vehicles and charging systems and carbon storage. Thereby diminishing the release of GHG, having healthier homes and the employment essential to these changes. The proposal to to permit CPP compliance by so called green natural gas(biomethane) inherently produces GHG and it diverts money from CCI reduction of GHG and from employment through the CCI program. The benefits from our program should be within Oregon. During the many months development of rules it was clearly difficult to design a program which would control GHG release from large stationary users. The REIT program was chosen as the best arrangement. This program needs to be firmly enforced. The TPP is an excellent program. Please do not change it in ways that diminish our limitations on GHG production or on support to impacted communities. I am grateful for the opportunity to make these comments.

Bill Harris

- Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits—ensuring that they benefit Oregon communities, and are not exported out of state.
- Thank you for the opportunity to provide comments.

**From:** [Edward Kushner](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 11, 2023 11:34:46 AM

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You don't often get email from [ejkushner@grassrootsmessage.com](mailto:ejkushner@grassrootsmessage.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Edward Kushner  
3919 SW Martins Ln  
Portland, OR 97239

**From:** [janna piper](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Monday, September 11, 2023 11:34:56 AM

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You don't often get email from jaqalthehybrid@yahoo.com. [Learn why this is important](#)

Dear Commissioners,

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

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Thank you for your consideration,

Sincerely,  
janna piper  
PO Box 15072  
Portland, OR 97293

**From:** [M. Jean Lickamy](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Monday, September 11, 2023 11:35:01 AM

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You don't often get email from mjlockamy@yahoo.com. [Learn why this is important](#)

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Thank you for your consideration,

Sincerely,  
M Jean Lickamy  
5169 Greensborough Ct  
Lake Oswego, OR 97035

**From:** [BC Shelby](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Monday, September 11, 2023 11:35:07 AM

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You don't often get email from bcshelby@gmail.com. [Learn why this is important](#)

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Thank you for your consideration,

Sincerely,  
BC Shelby  
1040 NW 10th Ave Apt 525  
Portland, OR 97209

**From:** [Morgan Beird](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Monday, September 11, 2023 11:35:11 AM

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You don't often get email from mfaynuss@gmail.com. [Learn why this is important](#)

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Sincerely,  
Morgan Beird  
2833 Ne Couch St.  
Portland, OR 97232

**From:** [Jonathan Lee](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Monday, September 11, 2023 11:35:15 AM

---

You don't often get email from [jontoshiolee@gmail.com](mailto:jontoshiolee@gmail.com). [Learn why this is important](#)

Dear Commissioners,

We can't miss any opportunities to strengthen Oregon's climate programs. Our state's Climate Protection Program (CPP) is only the third program of its kind in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that the Department of Environmental Quality (DEQ)'s draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. For the CPP to deliver, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. Hydrogen is a leak-prone gas, and the risks of hydrogen leakage must be incorporated into our decision-making.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Best Available Emissions Reduction (BAER) assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Thank you for your consideration,

Sincerely,  
Jonathan Lee  
1146 NE 69th Ave  
Portland, OR 97213

**From:** [Elaine Nelson](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Monday, September 11, 2023 11:35:22 AM

---

You don't often get email from elaine\_nelson47@yahoo.com. [Learn why this is important](#)

Dear Commissioners,

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

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Thank you for your consideration,

Sincerely,  
Elaine Nelson  
6786 S.W. 204th Avenue  
Aloha, OR 97078

**From:** [Sandra Joos](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Monday, September 11, 2023 11:35:30 AM

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You don't often get email from joosgalefamily@comcast.net. [Learn why this is important](#)

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Thank you for your consideration,

Sincerely,  
Sandra Joos  
4259 SW Patrick Pl  
Portland, OR 97239

**From:** [John Livingston](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Monday, September 11, 2023 11:35:39 AM

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You don't often get email from livingstonjohn@att.net. [Learn why this is important](#)

Dear Commissioners,

I have been a climate activist for over 15 years. I am tired of the slow acknowledgement and progress we have made. We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

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Thank you for your consideration,

Sincerely,  
John Livingston  
6473 Doral Drive SE Salem, Oregon 97306  
Salem, OR 97306

**From:** [Gary Gilardi](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Monday, September 11, 2023 11:35:43 AM

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You don't often get email from gary.gilardi@gmail.com. [Learn why this is important](#)

Dear Commissioners,

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

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Thank you for your consideration,

Sincerely,  
Gary Gilardi  
6590 Reservoir Rd  
The Dalles, OR 97058

**From:** [Susan Heath](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Monday, September 11, 2023 11:35:46 AM

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You don't often get email from forbux@hotmail.com. [Learn why this is important](#)

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Thank you for your consideration,

Sincerely,  
Susan Heath  
2552 Mount Vernon St SE  
Albany, OR 97322

**From:** [Elaine Johnson](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Monday, September 11, 2023 11:35:52 AM

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You don't often get email from ekjhomes@gmail.com. [Learn why this is important](#)

Dear Commissioners,

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Thank you for your consideration,

Sincerely,  
Elaine Johnson  
2904 SE Belmont St Apt 10  
Portland, OR 97214

**From:** [David Medford](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Monday, September 11, 2023 11:35:56 AM

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You don't often get email from parkermedford@gmail.com. [Learn why this is important](#)

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Thank you for your consideration,

Sincerely,  
David Medford  
7020 SW 82nd Ave  
Portland, OR 97223

**From:** [Brent Rocks](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Monday, September 11, 2023 11:36:01 AM

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You don't often get email from [brent\\_rocks@comcast.net](mailto:brent_rocks@comcast.net). [Learn why this is important](#)

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We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

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Thank you for your consideration,

Sincerely,  
Brent Rocks  
1518 SW Upper Hall St  
Portland, OR 97201

**From:** [Heather Dury](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Monday, September 11, 2023 11:36:06 AM

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You don't often get email from heather.dury@gmail.com. [Learn why this is important](#)

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Sincerely,  
Heather Dury  
1135 Se 36th Ave  
Portland, OR 97214

**From:** [Ian Shelley](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Monday, September 11, 2023 11:36:24 AM

---

You don't often get email from [ianjs@comcast.net](mailto:ianjs@comcast.net). [Learn why this is important](#)

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Thank you for your consideration,

Sincerely,  
Ian Shelley  
50 SW 97th Ave  
Portland, OR 97225

**From:** [Anthony Albert](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Monday, September 11, 2023 11:36:36 AM

---

You don't often get email from albert2910@msn.com. [Learn why this is important](#)

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Sincerely,  
Anthony Albert  
285 NW 35th St  
Corvallis, OR 97330

**From:** [Marilee Corey](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Monday, September 11, 2023 11:36:44 AM

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You don't often get email from handicrafts22@yahoo.com. [Learn why this is important](#)

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Thank you for your consideration,

Sincerely,  
Marilee Corey  
5200 Pettyjohn Rd S  
Salem, OR 97302

**From:** [Charlotta Ball](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Monday, September 11, 2023 11:36:49 AM

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You don't often get email from mariahball@yahoo.com. [Learn why this is important](#)

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Sincerely,  
Charlotta Ball  
237 SE 18th Ave Apt 202  
Hillsboro, OR 97123

**From:** [Diane Luck](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Monday, September 11, 2023 11:37:01 AM

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You don't often get email from dianeluck@mac.com. [Learn why this is important](#)

Dear Commissioners,

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that the Department of Environmental Quality (DEQ)'s draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. For the CPP to deliver, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. Hydrogen is a leak-prone gas, and the risks of hydrogen leakage must be incorporated into our decision-making.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Best Available Emissions Reduction (BAER) assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Thank you for your consideration,

Sincerely,  
Diane Luck  
3204 NE 27th Avenue  
Portland, OR 97212

**From:** [Dana Weintraub](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Monday, September 11, 2023 11:37:11 AM

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You don't often get email from [mrданaweintraub@tutanota.com](mailto:mrданaweintraub@tutanota.com). [Learn why this is important](#)

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Thank you for your consideration,

Sincerely,  
Dana Weintraub  
17124 SW Marty Ln  
Beaverton, OR 97003

**From:** [Maureen O'Neal](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Monday, September 11, 2023 11:37:18 AM

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You don't often get email from momoneal77@gmail.com. [Learn why this is important](#)

Dear Commissioners,

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

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Thank you for your consideration,

Sincerely,  
Maureen O'Neal  
9100 SW 80th Ave  
Portland, OR 97223

**From:** [bruce bauer](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Monday, September 11, 2023 11:37:25 AM

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You don't often get email from bbauer1942@yahoo.com. [Learn why this is important](#)

Dear Commissioners,

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I want my grandchildren to be able to have a quality life!

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Thank you for your consideration,

Sincerely,  
bruce bauer  
PO Box 1604  
Medford, OR 97501

**From:** [Eric Brody](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Monday, September 11, 2023 11:37:31 AM

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You don't often get email from [eric.g.brody@gmail.com](mailto:eric.g.brody@gmail.com). [Learn why this is important](#)

Dear Commissioners,

The scientific consensus is that we have 3 to 7 years to significantly reduce our greenhouse gas emissions before it is too late.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

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Thank you for your consideration,

Sincerely,  
Eric Brody  
3004 NE 47th Ave  
Portland, OR 97213

**From:** [Helen Moissant](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Monday, September 11, 2023 11:37:39 AM

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You don't often get email from hmoissant@aol.com. [Learn why this is important](#)

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Thank you for your consideration,

Sincerely,  
Helen Moissant  
2965 Ross Lane  
Central Point, OR 97502

**From:** [Mike Miller](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Monday, September 11, 2023 11:37:49 AM

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You don't often get email from [mjm172@msn.com](mailto:mjm172@msn.com). [Learn why this is important](#)

Dear Commissioners,

Get on the right side of history. Strengthen the CPP.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

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Thank you for your consideration,

Sincerely,  
Mike Miller  
21626 S Wisteria  
West Linn, OR 97068

**From:** [Niall Carroll](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Monday, September 11, 2023 11:38:03 AM

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You don't often get email from modusoperandi2@mac.com. [Learn why this is important](#)

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Thank you for your consideration,

Sincerely,  
Niall Carroll  
3991 Franklin Ave.  
Astoria, OR 97103

**From:** [Karen Harrington](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Monday, September 11, 2023 11:38:22 AM

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You don't often get email from karenjo.harrington@gmail.com. [Learn why this is important](#)

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Sincerely,  
Karen Harrington  
25470 Swiftshore Drive  
West Linn, OR 97068

**From:** [Blake Hottle](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Monday, September 11, 2023 11:39:11 AM

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You don't often get email from blake.hottle@comcast.net. [Learn why this is important](#)

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Sincerely,  
Blake Hottle  
604 NE Galloway St  
McMinnville, OR 97128

**From:** [Cynthia Jacobi](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Monday, September 11, 2023 11:39:15 AM

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You don't often get email from [cjacobi@charter.net](mailto:cjacobi@charter.net). [Learn why this is important](#)

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Thank you for your consideration,

Sincerely,  
Cynthia Jacobi  
428 NW 17th St  
Newport, OR 97365

**From:** [Jamie Shields](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Monday, September 11, 2023 11:39:19 AM

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You don't often get email from [jfillmore66@gmail.com](mailto:jfillmore66@gmail.com). [Learn why this is important](#)

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Thank you for your consideration,

Sincerely,  
Jamie Shields  
15739 NW Rondos Drive  
Portland, OR 97229

**From:** [Teresa Cohoon](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 11, 2023 11:39:23 AM

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You don't often get email from [ionizer.granule\\_0v@grassrootsmessage.com](mailto:ionizer.granule_0v@grassrootsmessage.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Teresa Cohoon  
555 Valley View Dr  
Medford, OR 97504

**From:** [William M. Musser IV](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Monday, September 11, 2023 11:39:28 AM

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You don't often get email from [wmusseriv@icloud.com](mailto:wmusseriv@icloud.com). [Learn why this is important](#)

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**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Best Available Emissions Reduction (BAER) assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Thank you for your consideration,

Sincerely,  
William M. Musser IV  
3225 NE 29th Avenue  
Portland, OR 97212

**From:** [Denise Duren](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Monday, September 11, 2023 11:39:32 AM

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You don't often get email from duren.denise@gmail.com. [Learn why this is important](#)

Dear Commissioners,

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

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Thank you for your consideration,

Sincerely,  
Denise Duren  
5818 Horizon View St SE  
Salem, OR 97306

**From:** [Cher Carter](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 11, 2023 11:39:54 AM

---

You don't often get email from [cartercher@grassrootsmessage.com](mailto:cartercher@grassrootsmessage.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

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Regards,  
Cher Carter  
1023 Roseburg Rd  
Myrtle Point, OR 97458

**From:** [Amy Roberts](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Monday, September 11, 2023 11:40:03 AM

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You don't often get email from homerjim82@gmail.com. [Learn why this is important](#)

Dear Commissioners,

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

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Thank you for your consideration,

Sincerely,  
Amy Roberts  
2883 NW Sunny Lane  
Albany, OR 97321

**From:** [Sandra Groen](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 11, 2023 12:18:58 PM

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You don't often get email from sangroen426@p2a.co. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

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Regards,  
Sandra Groen  
550 Pearl St  
Eugene, OR 97401

**From:** [jeanneroy62@gmail.com](mailto:jeanneroy62@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Climate 2023 rulemaking  
**Date:** Monday, September 11, 2023 1:31:52 PM

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You don't often get email from [jeanneroy62@gmail.com](mailto:jeanneroy62@gmail.com). [Learn why this is important](#)

To: Environmental Quality Commission  
From: Jeanne Roy, 6805 SW 12<sup>th</sup> Ave., Portland, R 97219  
Date: September 12, 2023  
Subject: 2023 Climate Rulemaking Comments

I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments and would enable the expansion of new large industrial emitters with the potential to emit unrestrained climate pollution in Oregon. I therefore urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from anthropogenic carbon sources does not comply with the CPP.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits, ensuring that they benefit Oregon communities and are not exported out of state.

**From:** [Alex s Lemus ruiz](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** No lo sé  
**Date:** Monday, September 11, 2023 2:39:10 PM

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You don't often get email from lemusalex797@gmail.com. [Learn why this is important](#)

Alex Salvador lemus

**From:** [Alex s Lemus ruiz](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Clima 2023  
**Date:** Monday, September 11, 2023 2:39:20 PM

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You don't often get email from lemusalex797@gmail.com. [Learn why this is important](#)

Alex Salvador lemus

**From:** [Kellyn Baez](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Monday, September 11, 2023 2:48:58 PM

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You don't often get email from [baez@willamettepartnership.org](mailto:baez@willamettepartnership.org). [Learn why this is important](#)

Dear Commissioners,

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

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Thank you for your consideration,

Kellyn Baez

Sincerely,  
Kellyn Baez  
9415 N Fairhaven Ave  
Portland, OR 97203

**From:** [karen.hudnall](mailto:karen.hudnall@advocatefor.me)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 11, 2023 4:18:55 PM

---

You don't often get email from karen.hudnall@advocatefor.me. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Base your work on the science;  
Belief/opinion don't count.

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

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Regards,  
karen hudnall  
3155 S Moody Ave  
Portland, OR 97239

**From:** [Virginia Goldsmith](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 11, 2023 4:47:46 PM

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You don't often get email from [viriniagoldsmith43@forgrassroots.com](mailto:viriniagoldsmith43@forgrassroots.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Virginia Goldsmith  
22121 Penn Rd  
Veneta, OR 97487

**From:** [Paris Star](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 11, 2023 6:08:01 PM

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You don't often get email from [paristarmarie@sendgrassroots.com](mailto:paristarmarie@sendgrassroots.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Paris Star  
4616 SE Roethe Rd  
Portland, OR 97267

**From:** [Carra Sahler](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Question re: 2023 Climate Rulemaking  
**Date:** Tuesday, September 12, 2023 8:05:05 AM

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You don't often get email from sahler@lclark.edu. [Learn why this is important](#)

Good morning, DEQ team,

I wonder if one of you could respond to this hypothetical and answer this question for me.

Grey hydrogen is produced in Texas with fossil gas. A nongovernmental agency is formed to create certificates associated with the production of the hydrogen. The hydrogen is injected into a pipe in Texas. Theoretically, that pipeline connects to Oregon. A gas utility in Oregon purchases the certificate and records it through a book and claim system. The "use of the fuel" results in lower GHG emissions. That is denoted on the certificate. **Can a gas utility use that certificate to demonstrate emissions reductions for purposes of compliance with the Climate Protection Program? Is DEQ proposing to independently determine an emissions reduction from the environmental attributes noted in the certificate? If so, how and where is that defined in the rules?**

Thanks so much for any guidance you can offer.

Warmly,  
Carra

Carra Sahler, J.D.  
She/Her/Hers  
Director and Staff Attorney, Green Energy Institute  
Lewis & Clark Law School  
(971) 213-9480 (cell)  
[sahler@lclark.edu](mailto:sahler@lclark.edu)



**From:** [Salvador Luna](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, September 12, 2023 8:32:42 AM

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You don't often get email from sluns59@forgrassroots.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Salvador Luna  
1274 SW Laura Ct  
Troutdale, OR 97060

**From:** [Jean Trygstad](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Oregon Climate protection program comment to Rule making.  
**Date:** Tuesday, September 12, 2023 10:34:26 AM

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You don't often get email from trygstadjm07@gmail.com. [Learn why this is important](#)

Greetings DEQ Administration

One one level I'm surprised at the fact that 12 of the 14 advisory members are from the Oil and Gas sector. After all, this program is intended to protect the 4 million people that reside in Oregon.

What we need is to have less GHG emissions.

We need reliable means to measure Air pollution including PPE

We need strong compliance monitoring and reporting and it should be implemented by Q4 2025.

We need the industry and your agency to place value on the health of the public and of animals, plants, rivers and wetlands.

We need more equal representation on Rule Making Committee

We all know from past behavior that the industry will capitalize on every loophole; notably RTC ;NO NO NO to RTC ! Delete it from the options.

Thank you

CC Governor Kotek

--

Jean Trygstad

**From:** [Melissa Medeiros](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Tuesday, September 12, 2023 12:13:55 PM

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You don't often get email from melissa@landlinedesign.com. [Learn why this is important](#)

Chair George, Vice Chair Baraso, members of the Commission:

My name is Melissa Medeiros and I am a volunteer with Families for Climate. I am a parent to my daughter, a 5th grader, I am writing this testimony because as their parent, my most fundamental responsibility is to protect them from harm, and irreversible climate change gravely threatens their future.

**The Climate Protection Program is absolutely critical for Oregon to reduce our climate pollution on the urgent timeline dictated by current science.** However, I am deeply concerned that the current proposed rules would undermine the effectiveness of the CPP, and put the necessary emissions reductions out of reach.

Specifically, I am worried that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane offsets, which will hinder the transition to non-emitting alternatives, while failing to deliver direct benefits to Oregonians. I am also worried that the rules as currently written will allow new industrial emitters to produce unrestricted climate pollution in Oregon.

I am asking DEQ to make the following important changes to the rulemaking:

1. **Restrict biomethane (aka renewable natural gas (RNG) and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians.** The stated goals of the CPP are to reduce greenhouse gas emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers, and out-of-state offsets accomplish none of those goals.
2. **Strengthen emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction (BAER) program.** As the only existing state regulation on major industrial emitters, it is vital that the CPP works to ensure science-based emissions reductions from existing stationary sources and deter development of new stationary sources in Oregon. Given Oregon's growing industrial sector, it is especially critical that DEQ use this rulemaking to strengthen the integrity of the BAER program. Large industrial emitters must be held accountable for their climate pollution.

Oregon families need the Climate Protection Program to live up to its name. Please strengthen the rules so it can protect our children's future, not corporate profits.

Thank you for the opportunity to comment on this rulemaking.

--

Melissa Medeiros, MLA, BA Arch

Landscape Architect, Principal

[www.landlinedesign.com](http://www.landlinedesign.com)

503 432 9885



**From:** [Alan Journet](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Tuesday, September 12, 2023 12:35:22 PM  
**Attachments:** [CPP adjustments CEE final.docx](#)

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You don't often get email from alanjournet@gmail.com. [Learn why this is important](#)

Colleagues:

Please find attached comments from the Consolidated Oregon Indivisible Network Climate,, Energy and Environment Team and the Indivisible Congressional District 2 Chapter.

Thanks,

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Alan Journet  
Co-facilitator  
Southern Oregon Climate Action Now (SOCAN)  
<https://socan.eco>

541-301-4107 Cell  
541-500-2331 VOIP  
7113 Griffin Lane  
Jacksonville, OR 97530-9342  
[alanjournet@gmail.com](mailto:alanjournet@gmail.com) or  
[alan@socan.eco](mailto:alan@socan.eco)

**From:** [KB Mercer](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** DEQ 2023 Rulemaking  
**Date:** Tuesday, September 12, 2023 12:45:45 PM

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[You don't often get email from kb@travelinglantern.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Chair George, Vice Chair Baraso, and members of the Commission, DEQ and DEQ staff;

My name is KB Mercer and I am a volunteer with the Metro Climate Action Team. My husband David and I are deeply concerned about DEQ's 2023 climate rulemaking.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from anthropogenic carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

KB Mercer & David Huffman  
10811 SE Schiller St.  
Portland, OR 97266

**From:** [Diana Bailey](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Tuesday, September 12, 2023 1:34:59 PM

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You don't often get email from dianamoonsong@yahoo.com. [Learn why this is important](#)

Dear Commissioners,

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that the Department of Environmental Quality (DEQ)'s draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. For the CPP to deliver, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. Hydrogen is a leak-prone gas, and the risks of hydrogen leakage must be incorporated into our decision-making.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Best Available Emissions Reduction (BAER) assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Thank you for your consideration,

Sincerely,  
Diana Bailey  
PO Box 2142  
Roseburg, OR 97470

**From:** [Karen Jacobson](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate rulemaking for the Climate Protection Program- keep it strong and green!  
**Date:** Tuesday, September 12, 2023 2:04:57 PM

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You don't often get email from [kajacobson@gmail.com](mailto:kajacobson@gmail.com). [Learn why this is important](#)

Chair George, Vice Chair Baraso, members of the Commission:

My name is Karen Jacobson and I am a volunteer with Families for Climate. I am a mother to 2 bright, strong daughters named Alaina and Juliet who attend elementary school in Portland, Oregon. I am writing this testimony because as their mother, my most fundamental responsibility is to protect them from harm, and irreversible climate change gravely threatens their future.

I am deeply concerned that the current proposed rules would undermine the effectiveness of the Climate Protection Program.

Specifically, I am worried that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane offsets, which will hinder the transition to non-emitting alternatives, while failing to deliver direct benefits to Oregonians. I am also worried that the rules as currently written will allow new industrial emitters to produce unrestricted climate pollution in Oregon.

I am asking DEQ to make the following important changes to the rulemaking:

1. **Restrict biomethane (aka renewable natural gas (RNG) and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians.** The stated goals of the CPP are to reduce greenhouse gas emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers, and out-of-state offsets accomplish none of those goals.
2. **Strengthen emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction (BAER) program.** As the only existing state regulation on major industrial emitters, it is vital that the CPP works to ensure science-based emissions reductions from existing stationary sources and deter development of new stationary sources in Oregon. Given Oregon's growing industrial sector, it is especially critical that DEQ use this rulemaking to strengthen the integrity of the BAER program. Large industrial emitters must be held accountable for their climate pollution. For example, companies as large as Amazon do not need polluting exemptions to build or expand operations at data centers in Eastern Oregon.

Thank you for the opportunity. I'm sure, like me, you have loved ones both young and old who love Oregon and want our beautiful state to be protected. Let's work together to protect Oregon from outside polluters.

Karen Jacobson

**From:** [Emily Stebbins](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Tuesday, September 12, 2023 2:09:42 PM

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You don't often get email from [stebbins.emily@gmail.com](mailto:stebbins.emily@gmail.com). [Learn why this is important](#)

Chair George, Vice Chair Baraso, and members of the Commission:

My name is Emily Stebbins, and I am a parent and educator in Portland.

Climate chaos poses an imminent threat, as well as a grave threat to the future of our children. The Climate Protection Program is critical for Oregon to reduce our climate pollution on the urgent timeline necessary.

However, I am deeply concerned that the current proposed rules would undermine its effectiveness. DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane offsets, which will hinder the transition to non-emitting alternatives, while failing to deliver direct benefits to Oregonians. I am also worried that the rules as currently written will allow new industrial emitters to produce unrestricted climate pollution in Oregon.

I urge DEQ to make the following key changes:

1. **Restrict biomethane (aka renewable natural gas (RNG) and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians.** Natural gas poses a direct health threat in our homes and workplaces, as well as in our broader community and global climate. Out-of-state offsets will not accomplish the CPP's stated goals of reducing greenhouse gas emissions and other air pollutants, maximizing public health benefits, and minimizing costs for consumers.
2. **Strengthen emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction (BAER) program.** As the only existing state regulation on major industrial emitters, it is vital that the CPP works to ensure science-based emissions reductions from existing stationary sources and deter development of new stationary sources in Oregon. Given Oregon's growing industrial sector, it is especially critical that DEQ use this rulemaking to strengthen the integrity of the BAER program. Large industrial emitters must be held accountable for their climate pollution.

Oregon families need the Climate Protection Program to live up to its name. Please strengthen the rules so it can protect our children's future, not corporate profits.

Thank you for the opportunity to comment on this rulemaking.

Emily Stebbins

**From:** [pecodo.1](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Tuesday, September 12, 2023 2:46:05 PM

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You don't often get email from [renebragacampa@gmail.com](mailto:renebragacampa@gmail.com). [Learn why this is important](#)

Thank you for the opportunity to provide comment today on DEQ's 2023 climate rulemaking, as DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP—a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon.

- I therefore strongly urge DEQ to amend the proposed rules by:
  - 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of “book and claim” accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
  - 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program. The CPP already provides significant flexibility/cost constraints for gas utilities to comply. Allowing further flexibility—e.g. use of RTCs—will hinder the transition to non-emitting alternatives and fail to reduce climate/air pollution or deliver health/consumer benefits for environmental justice communities in Oregon. These projects deliver no direct benefits to Oregonians, while CCI's will provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.
- 

As the only existing state regulation on major industrial emitters, it is vital that the CPP works to ensure science-based emissions reductions from existing stationary sources and deter development of new stationary sources in Oregon.

- Any new stationary source or any proposed modification that has the potential to emit GHGs in any quantity should complete a BAER assessment prior to construction.
- As-is, the BAER approach for regulating large stationary sources will not effectively reduce sector-wide emissions.
- As one example, Amazon is seeking multiple permits to build or expand operations at several energy-intensive, fossil gas-powered data centers in Eastern Oregon; these data centers alone will result in an enormous increase in gas use and GHG

emissions.

- Further, in the 2023 legislative session, lawmakers adopted the “Oregon CHIPS Act,” which provides \$210 million in funding and creates land use exemptions to accelerate the development of semiconductor plants or other advanced manufacturing facilities.
- Given the increasing inevitability of a growing industrial sector, it is especially critical that DEQ use this rulemaking to strengthen the integrity of the BAER program.

Thank you

**From:** [Jana Carole](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, September 12, 2023 4:34:56 PM

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You don't often get email from [ksjc1988@grsdelivery.com](mailto:ksjc1988@grsdelivery.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Jana Carole  
524 Granite St  
Ashland, OR 97520

**From:** [Mary Kate McVey](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Changes to this year's Climate Rulemaking  
**Date:** Tuesday, September 12, 2023 8:05:10 PM

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You don't often get email from [mkagainstclimatechange@gmail.com](mailto:mkagainstclimatechange@gmail.com). [Learn why this is important](#)

Chair George, Vice Chair Baraso, members of the Commission:

My name is Mary Kate McVey and I am a supporter of Families for Climate. I am the mother of two amazing girls, Fiona Rose (3) and Vivian (7 months).

I am submitting this testimony because as their mother, my most fundamental responsibility is to protect them from harm, and irreversible climate change gravely threatens their future.

The Climate Protection Program is absolutely critical for Oregon to reduce our climate pollution on the urgent timeline dictated by current science. However, I am deeply concerned that the current proposed rules would undermine the effectiveness of the CPP, and put the necessary emissions reductions out of reach.

Specifically, I am worried that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane offsets, which will hinder the transition to non-emitting alternatives, while failing to deliver direct benefits to Oregonians. I am also worried that the rules as currently written will allow new industrial emitters to produce unrestricted climate pollution in Oregon.

I am asking DEQ to make the following important changes to the rulemaking:

Restrict biomethane (aka renewable natural gas (RNG) and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians. The stated goals of the CPP are to reduce greenhouse gas emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers, and out-of-state offsets accomplish none of those goals.

Strengthen emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction (BAER) program. As the only existing state regulation on major industrial emitters, it is vital that the CPP works to ensure science-based emissions reductions from existing stationary sources and deter development of new stationary sources in Oregon. Given Oregon's growing industrial sector, it is especially critical that DEQ use this rulemaking to strengthen the integrity of the BAER program. Large industrial emitters must be held accountable for their climate pollution.

Oregon families need the Climate Protection Program to live up to its name. Please strengthen the rules so it can protect our children's future, not corporate profits. We're running out of time to do the right thing.

I appreciate the opportunity to comment on this rulemaking.

**From:** [Hannah Kuepper](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, September 12, 2023 10:40:34 PM

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You don't often get email from hannahkuepper@foradvocacy.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Hannah Kuepper  
14020 Se Portland View Pl  
OR 97015

**From:** [Susan Weinstein](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Tuesday, September 12, 2023 10:50:00 PM

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You don't often get email from [sww02755@gmail.com](mailto:sww02755@gmail.com). [Learn why this is important](#)

To Chair George, Vice Chair Baraso, and Members of the Commission:

My name is Susan Weinstein and I live in Fairview, Oregon. I am the grandmother of Miguel, 16; Nico, 12; and Ellie, 5.

They, like all children, need to be kept safe and protected from danger. Irreversible climate change threatens their future.

The Climate Protection Program (CPP) is absolutely critical for Oregon and for providing the opportunity for our children and grandchildren to have safe and healthy lives.

We need to reduce our climate pollution on the urgent timetable dictated by current science.

The rules currently proposed would, I fear, undermine the effectiveness of the Climate Protection Plan. The necessary emissions reductions would be put out of reach of achievement.

I think that the DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane offsets which hinder the transition to non-emitting alternatives; and, fail to deliver direct benefits to Oregonians.

Also, I am worried that the rules as currently written will allow new industrial emitters to produce unrestricted climate pollution in Oregon.

Respectfully, I ask the DEQ to make the following important changes to the rulemaking:

1. Restrict biomethane (aka renewable natural gas (RNG)) and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians. Out-of-state offsets do not achieve the CPP goals of reducing gas emissions and other air pollutants; do not maximize public health benefits; and, do not minimize costs for consumers.

2. Strengthen emissions reduction requirements for new or expanded large stationary source facilities in Oregon under CPP's Best Available Emissions Reduction (BAER) program. With Oregon's growing industrial sector, it is critical that DEQ use this rulemaking to strengthen the integrity of the BAER program.

Please strengthen these rules so that they can protect the future of all of our children and grandchildren.

Thank you for the opportunity to comment on the rulemaking.

Susan Weinstein  
1236 NE Market Drive

Fairview, OR 97024

email: [sww02755@gmail.com](mailto:sww02755@gmail.com)

**From:** [Matthew Allensworth](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Wednesday, September 13, 2023 6:10:53 AM

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You don't often get email from [straymatt8965@foradvocacy.com](mailto:straymatt8965@foradvocacy.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Matthew Allensworth  
46503 McKenzie Hwy  
Vida, OR 97488

**From:** [Krislyn Dillard](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Wednesday, September 13, 2023 7:19:29 AM

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You don't often get email from [runteus@gmail.com](mailto:runteus@gmail.com). [Learn why this is important](#)

As an life long Oregonian I have come to rely on our strong environmental laws here and enjoy the benefits of cleaner air quality then other states with less regulatory oversight. Recently, due to so many wildfires the air quality has been pretty bad. That is why I am so surprised to hear the DEQ is reducing these regulations for large industrial emitters. Everyone has to do their part for clean air from someone like me to huge corporations like Amazon. I strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from anthropogenic carbon sources does not comply with the CPP.  
Krislyn Dillard

**From:** [Marci Ditty](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Wednesday, September 13, 2023 7:22:12 AM

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You don't often get email from marci.ditty@gmail.com. [Learn why this is important](#)

Oregonians have always respected our beautiful clean lands, waterways and air. Please enforce the restrictions under the BAER program so we do our best toward climate control.

**From:** [Ricky Dolton](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Wednesday, September 13, 2023 7:30:41 AM

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You don't often get email from [saintdigby@advocacymessages.com](mailto:saintdigby@advocacymessages.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

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**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Ricky Dolton  
1814 21st Ave  
Forest Grove, OR 97116

**From:** [Joe Craig](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Wednesday, September 13, 2023 7:35:30 AM

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[You don't often get email from joesilverton@msn.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

To those involved - each summer large parts of Oregon and the West are blanketed in smoke. This is dangerous to all living things by contaminating the air needed for respiration and greatly reduces the amount of sunshine needed for growth and life. Despite this huge amount of carbon-based pollution Oregon still allows field burning! Some days this adds to existing smoke and on other clear days it totally covers and fouls the air with these HUGE clouds of smoke choking life and blocking the sun. Please stop this ridiculous field burning. The Oregon ag industry is huge and powerful, filled with intelligent people. Apparently they need to be forced to develop ag methods that are safe for all life and not just what is best and most expedient for their profits. Please take action to end this practice. Thank you. Joe and Pam Craig, Silverton OR.

Sent from my iPhone

**From:** [Annie Francoise](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Wednesday, September 13, 2023 7:43:35 AM

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[You don't often get email from [mccuen7691@comcast.net](mailto:mccuen7691@comcast.net). Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Climate is one of the most important issues on the agenda. Please delay the effects of climate change as long as possible by reinforcing and applying the rules. Thank you.

Sent from my iPad

**From:** [Kay Cusick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Wednesday, September 13, 2023 7:47:39 AM

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You don't often get email from kcastrid50@gmail.com. [Learn why this is important](#)

It's depressing to constantly read about the irresponsible greed from oil and gas companies. Just tell them no. Thank you. Kay C.

**From:** [Kelly O'Hanley](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking - public comment  
**Date:** Wednesday, September 13, 2023 7:48:22 AM

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You don't often get email from kohanley@gmail.com. [Learn why this is important](#)

1. Restrict biomethane (aka renewable natural gas (RNG)) and hydrogen used for CPP compliance.
2. Strengthen emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction (BAER) program.

Please!!!!

**From:** [Gael Nagle](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Wednesday, September 13, 2023 8:03:30 AM

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You don't often get email from [batiksbygael@advocatefor.me](mailto:batiksbygael@advocatefor.me). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

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**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Gael Nagle  
37415 S Hibbard Rd  
Molalla, OR 97038

**From:** [Donald Winn](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Wednesday, September 13, 2023 8:18:46 AM

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[You don't often get email from winndm@comcast.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

I am writing today to urge the DEQ to strengthen its current proposed rules by increasing emissions reduction requirements on large industrial operations under the BAER program and to not allow out-of-state biomethane investments to count here in Oregon. Thank you very much, Donald Winn, 5252 NE Multnomah St, Portland, OR 97213.

Sent from my iPad

**From:** [Ann Watters](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Wednesday, September 13, 2023 8:26:11 AM

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You don't often get email from ann.sue@icloud.com. [Learn why this is important](#)

Please, Keep climate protections on track with the new rules. Boost the rules. Thank you  
Our lives are at stake!  
Sincerely

Ann Watters RPE  
1940 Breyman NE  
Salem, Oregon  
97301-4352  
1-503-581-6512 home  
1- 971-345-7961 mobile

"Faith is the bird that sings when the dawn is still dark."

— Rabindranath Tagore —

**From:** [Veroune Chittim](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Wednesday, September 13, 2023 8:44:10 AM

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[You don't often get email from verounechittim2@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Natural gas is toxic and deserves every restriction to limit its horrible emissions to our country and our earth!

**From:** [Kaye Waite](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Wednesday, September 13, 2023 8:57:59 AM

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You don't often get email from kjswaite@comcast.net. [Learn why this is important](#)

I am concerned that DEQ's current proposed rules would effectively undermine the CPP-a program that is absolutely essential to achieving our state's climate solution reduction goals, and which was adopted with overwhelming public support following an extensive 18 month rule making and stake holder engagement process.

The Oregon Department of Environmental Quality (DEQ) must ensure the Climate Protection Program stays on track to achieve its climate goals and deliver public health, economic, and job benefits for Oregon communities. Specifically, it is vital that the DEQ strengthen its [current proposed rules](#) by:

1. Restricting biomethane (aka renewable natural gas (RNG)) and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians.
2. Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction (BAER) program.

Thank you,  
Kaye Waite

**From:** [Stephen and Jacqueline Cutler](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Wednesday, September 13, 2023 9:08:18 AM

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You don't often get email from [snjcutler@gmail.com](mailto:snjcutler@gmail.com). [Learn why this is important](#)

The Oregon Department of Environmental Quality (DEQ) must ensure the Climate Protection Program stays on track to achieve its climate goals and deliver public health, economic, and job benefits for Oregon communities.

I am writing to strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of “book and claim” accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP’s Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from anthropogenic carbon sources does *not* comply with the CPP.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits—ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Stephen and Jacqueline Cutler  
Yachats, Oregon

**From:** [Katrina Marshall](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Wednesday, September 13, 2023 9:13:48 AM

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You don't often get email from [katrina@stillpointfarms.com](mailto:katrina@stillpointfarms.com). [Learn why this is important](#)

Hello, I am a member of the Sierra Club chapter in Oregon and want to comment on this climate rulemaking. I live in Sisters OR.

The Oregon Department of Environmental Quality (DEQ) must ensure the Climate Protection Program stays on track to achieve its climate goals and deliver public health, economic, and job benefits for Oregon communities. Specifically, it is vital that the DEQ strengthen its [current proposed rules](#) by:

1. Restricting biomethane (aka renewable natural gas (RNG)) and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians.
2. Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction (BAER) program.

Thank you, Kathy Marshall

**From:** [Rebel Russell](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Wednesday, September 13, 2023 9:23:05 AM

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You don't often get email from rebelrussel56@yourconstituent.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

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**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Rebel Russell  
16745 SE Division St Unit 134  
Portland, OR 97236

**From:** [Kellenter, Sigrid](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** "2023 Climate Rulemaking"  
**Date:** Wednesday, September 13, 2023 9:24:38 AM

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You don't often get email from [kellents@union.edu](mailto:kellents@union.edu). [Learn why this is important](#)

Hello Chair George, Vice Chair Baraso, members of the Commission,

- Thank you for the opportunity to provide comment today on DEQ's 2023 climate rulemaking.
- As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.
- By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.
- However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered.
- I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.
- Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon.
- By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

- I therefore strongly urge DEQ to amend the proposed rules by:
  - 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of “book and claim” accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
  - 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP’s Best Available Emissions Reduction program.
  
- I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from anthropogenic carbon sources does *not* comply with the CPP.
  
- Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits— ensuring that they benefit Oregon communities, and are not exported out of state.
  
- Thank you for the opportunity to provide comments.

Sincerely,

Sigrid Kellenter Girdner

6504 N Commercial Ave, #8

Portland OR 97217

**From:** [Darlene Knox](#)  
**To:** [2023 Climate \\* DEQ; Darlene Knox](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Wednesday, September 13, 2023 9:27:24 AM

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[You don't often get email from [knoxruby@bendcable.com](mailto:knoxruby@bendcable.com). Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear DEQ,

Please help save our planet for everyone including all our future generations. Look at how the climate change has affected us already just think what it will be like in 10 years if we don't do something now. Think of your kids and grandkids do you want them to be able to enjoy all that nature has to offer? Where we live we weren't able to enjoy almost a whole month of summer due to wildfire smoke and having to stay indoors. That is not how I want to live. When I was growing up in Oregon we might have one or two wildfires a summer and they were contained fairly quickly. If you want to see how many fires there are now just get the app Watch Duty and take a look. It is really sad to see all the beautiful forest going up in smoke and all the wildlife that is being destroyed. Then take a look around the world at all the climate disasters going on with hurricane, floods, tornados and fires. Look at what is happening to all the areas with permafrost that are thawing due to warming climates and all the methane that is being put into our atmosphere causing even more climate warming.

Please help our planet to survive for all to enjoy now and into the future.

Darlene Knox

**From:** [Erin Anderson](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Wednesday, September 13, 2023 9:33:39 AM

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The Oregon Department of Environmental Quality (DEQ) must ensure the Climate Protection Program stays on track to achieve its climate goals and deliver public health, economic, and job benefits for Oregon communities. Specifically, it is vital that the DEQ strengthen its [current proposed rules](#) by:

1. Restricting biomethane (aka renewable natural gas (RNG)) and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians.
2. Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction (BAER) program.

Thank you,  
Erin Anderson

**From:** [Dennis West](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Wednesday, September 13, 2023 9:43:57 AM

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You don't often get email from 2016denpat@gmail.com. [Learn why this is important](#)

CORPORATE AMERICA BELIEVES THEY ARE EXEMPT FROM SCIENCE KNOWLEDGE, COMMON SENSE, WILL OF THE PEOPLE AND LAWS OF THE LAND. WHY? GREED IS THE DRIVING FORCE BEHIND EVERYTHING CORPORATE AMERICA DOES, ALONG WITH THE LIES THEY TELL TO PROVE THEIR INNOCENCE TO THE STUPID CITIZENS WHO BELIEVE THE BULL SHIT OF CLIMATE DENIAL, DANGER, AND DEATH AND DESTRUCTION OF LIVES AND PROPERTY.

ACCOUNTABILITY WILL NEVER HAPPEN UNTIL WE GET THE CORPORATE BOUGHT OFF MINIONS OUT OF OUR GOVERNMENT TOP TO BOTTOM, SENATE, HOUSE AND JUDICIARY. SCOTUS WILL REVERSE ALL THE CIVIL PROGRESS MADE SINCE WW II !!!

DENNIS WEST  
OREGON 97498

**From:** [Heather Walker-Dale](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Wednesday, September 13, 2023 9:50:21 AM

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Dear all,

I am concerned that DEQ's current proposed rules would effectively undermine the CPP— a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

- Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon.
- By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.
- I therefore strongly urge DEQ to amend the proposed rules by:
  - 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
  - 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.
- I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from anthropogenic carbon sources does *not* comply with the CPP.
- Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits— ensuring that they benefit Oregon communities, and are not exported out of state.

Given the increasing inevitability of a growing industrial sector, it is especially critical that DEQ use this rulemaking to strengthen the integrity of the BAER program.

Thanks for your attention to these pressing matters,

Heather Dale

**From:** [Walt Mintkeski](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Wednesday, September 13, 2023 9:54:10 AM

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To: Members of the Oregon Environmental Quality Commission:

Thank you for this opportunity to provide comments on DEQ's rulemaking process for Oregon's Climate Protection Program (CPP) .

DEQ's proposed rules will effectively undermine the CPP. They will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

Specifically, I am concerned that the current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unregulated climate pollution in Oregon.

I therefore strongly urge DEQ to amend the proposed rules as follows:

- 1) Restrict biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen which is injected into a pipeline within Oregon
- 2) Strengthen emission reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including that synthetic methane derived from anthropogenic carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits. It will also ensure that the CPP will benefit Oregon communities, not out of state entities.

Walt Mintkeski  
Portland,OR

**From:** [Karen Fletcher](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Wednesday, September 13, 2023 9:59:54 AM

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Please strengthen the current proposed rules. Restrict the use of biomethane natural gas and hydrogen to only that whichever directly benefits Oregonians. And strengthen emissions reductions requirements for new facilities.

Our beautiful state is counting on you.

Karen Fletcher  
5040 SE Henry Street  
Portland 97206

**From:** [Robert Duval](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Wednesday, September 13, 2023 10:07:52 AM

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Please keep our climate protection strong. Thanks, Robert Duval

**From:** [Rachael Rude](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Wednesday, September 13, 2023 10:30:37 AM

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You don't often get email from [carebearstare@advocacymessages.com](mailto:carebearstare@advocacymessages.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Rachael Rude  
Beaverton, OR 97006

**From:** [Max Scher](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Public Comment - 2023 Climate Rulemaking  
**Date:** Wednesday, September 13, 2023 10:38:44 AM

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You don't often get email from maxobaxo@gmail.com. [Learn why this is important](#)

Chair George, Vice Chair Baraso, members of the Commission:

My name is Max Scher, and I am a volunteer with Families for Climate. I am a father to two little girls, Clarabel & Felicity. I am writing this testimony because as their parent, my most fundamental responsibility is to protect them from harm, and irreversible climate change gravely threatens their future.

The Climate Protection Program is absolutely critical for Oregon to reduce our climate pollution on the urgent timeline dictated by current science. However, I am deeply concerned that the current proposed rules would undermine the effectiveness of the CPP, and put the necessary emissions reductions out of reach.

Specifically, I am worried that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane offsets, which will hinder the transition to non-emitting alternatives, while failing to deliver direct benefits to Oregonians. I am also worried that the rules as currently written will allow new industrial emitters to produce unrestricted climate pollution in Oregon.

I am asking DEQ to make the following important changes to the rulemaking:

1. **Restrict biomethane (aka renewable natural gas (RNG) and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians.** The stated goals of the CPP are to reduce greenhouse gas emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers, and out-of-state offsets accomplish none of those goals. These projects deliver no direct benefits to Oregonians, while CCIs will provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions. The CCI program was developed and informed by many months of engagement with environmental justice communities in Oregon, with the goal of supporting investments that maximize public health, jobs, and cost-saving benefits for these and other communities historically disenfranchised and disproportionately impacted by economic disinvestment, health challenges, and environmental harms.
2. **Strengthen emissions reduction requirements for new or expanded large**

**stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction (BAER) program.** As the only existing state regulation on major industrial emitters, it is vital that the CPP works to ensure science-based emissions reductions from existing stationary sources and deter development of new stationary sources in Oregon. Unfortunately, since the adoption of the final CPP rules in 2021, increasing emissions from Oregon's industrial sector has become a reality. Continuing to enable the development of new sources or expansion of existing sources flies in the face of the CPP's stated equity and climate goals. Given Oregon's growing industrial sector, it is especially critical that DEQ use this rulemaking to strengthen the integrity of the BAER program. Large industrial emitters must be held accountable for their climate pollution.

Oregon families need the Climate Protection Program to live up to its name. Please strengthen the rules so it can protect our children's future, not corporate profits.

Thank you for the opportunity to comment on this rulemaking.

Sincerely,  
Max Scher

**From:** [debbie061653@aol.com](mailto:debbie061653@aol.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Wednesday, September 13, 2023 12:00:21 PM

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You don't often get email from [debbie061653@aol.com](mailto:debbie061653@aol.com). [Learn why this is important](#)

The Oregon Department of Environmental Quality (DEQ) must ensure the Climate Protection Program stays on track to achieve its climate goals and deliver public health, economic, and job benefits for Oregon communities. Specifically, it is vital that the DEQ strengthen its [current proposed rules](#) by:

1. Restricting biomethane (aka renewable natural gas (RNG)) and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians.
2. Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction (BAER) program.

**From:** [Drew Barowicz](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Wednesday, September 13, 2023 12:43:43 PM

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[You don't often get email from dbarowicz@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Hi there,

Thank you I'm advance for taking the time to read my message.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon.

Kindly,  
Drew

**From:** [safest-nitrate-0i@icloud.com](mailto:safest-nitrate-0i@icloud.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Wednesday, September 13, 2023 1:14:17 PM

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You don't often get email from safest-nitrate-0i@icloud.com. [Learn why this is important](#)

Good afternoon!

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP— a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the

current rules where they exist, including notably, that synthetic methane derived from anthropogenic carbon sources does *not* comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits—ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Tori Herbst

**From:** [Gary McCuen](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Wednesday, September 13, 2023 2:23:32 PM

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You don't often get email from mccuen7691@comcast.net. [Learn why this is important](#)

DEQ must ensure the Climate Protection Program stays on track to achieve its climate goals and deliver public health, economic, and job benefits for Oregon communities.

Specifically, it is vital that DEQ strengthen its [current proposed rules](#) by:

1. Restricting biomethane (aka renewable natural gas (RNG) and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians.
  
2. Strengthening emissions reduction requirements for new or expanded large industrial facilities in Oregon under the CPP's Best Available Emissions Reduction (BAER) program.

*Without a livable planet, nothing else matters.*  
*- Peter Kalmus, NASA Climate Scientist*

**From:** [Marie Wakefield](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Wednesday, September 13, 2023 2:41:26 PM

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You don't often get email from wakefieldm\_2000@yahoo.com. [Learn why this is important](#)

- Thank you for the opportunity to provide comment today on DEQ's 2023 climate rulemaking.
- As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.
- By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.
- However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered.
- I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.
- Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon.
- By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.
- I therefore strongly urge DEQ to amend the proposed rules by:

- - 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of “book and claim” accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
  - 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP’s Best Available Emissions Reduction program.
- I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from anthropogenic carbon sources does *not* comply with the CPP.
- Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits— ensuring that they benefit Oregon communities, and are not exported out of state.
- Thank you for the opportunity to provide comments.

--

**Marie Wakefield**  
[wakefieldm\\_2000@yahoo.com](mailto:wakefieldm_2000@yahoo.com)

**From:** [jessica kelsey](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Wednesday, September 13, 2023 2:42:43 PM

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You don't often get email from [jessicakelsey21@sendgrassroots.com](mailto:jessicakelsey21@sendgrassroots.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
jessica kelsey  
2005 SW Custer St  
Portland, OR 97219

**From:** [Leslie Burke](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Wednesday, September 13, 2023 3:07:06 PM

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You don't often get email from mlburke3@foradvocacy.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Leslie Burke  
2090 Stone Hedge Dr NE  
Keizer, OR 97303

**From:** [Bryan deSilva](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rule making comment  
**Date:** Wednesday, September 13, 2023 3:45:44 PM

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To the DEQ,  
Bottom line = Please strengthen the proposed 2023 climate rules.

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane or hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and

- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits— ensuring that they benefit Oregon communities, and are not exported out of state.

Bryan deSilva  
Bend, OR

**From:** [David Neumann](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Please strengthen proposed 2023 climate rules  
**Date:** Wednesday, September 13, 2023 4:02:44 PM

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Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered.

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By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

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Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits— ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Dave Neumann  
430 Nandina Street  
Ashland, OR 97520

**From:** [William O'Brien](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Wednesday, September 13, 2023 4:04:30 PM

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You don't often get email from wobobr123@sendgrassroots.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
William O'Brien  
12520 SW Gem Ln  
Beaverton, OR 97005

**From:** [PJ Carter](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Cc:** [PJ Carter](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Wednesday, September 13, 2023 4:29:30 PM

---

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**To:** Oregon Department of Environmental Quality  
**Re:** Climate Protection Program  
September 13, 2023

I totally agree with the statements below.

The Oregon Department of Environmental Quality (DEQ) must ensure the Climate Protection Program stays on track to achieve its climate goals and deliver public health, economic, and job benefits for Oregon communities. Specifically, it is vital that the DEQ *strengthen* its [current proposed rules](#) by:

1. Restricting biomethane (aka renewable natural gas (RNG)) and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians.
2. Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction (BAER) program.

~ PJ Carter  
Corvallis, OR

**From:** [PJ Carter](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Cc:** [PJ Carter](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Wednesday, September 13, 2023 4:29:30 PM

---

You don't often get email from pjc125@comcast.net. [Learn why this is important](#)

**To:** Oregon Department of Environmental Quality  
**Re:** Climate Protection Program  
September 13, 2023

I totally agree with the statements below.

The Oregon Department of Environmental Quality (DEQ) must ensure the Climate Protection Program stays on track to achieve its climate goals and deliver public health, economic, and job benefits for Oregon communities. Specifically, it is vital that the DEQ *strengthen* its [current proposed rules](#) by:

1. Restricting biomethane (aka renewable natural gas (RNG)) and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians.
2. Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction (BAER) program.

~ PJ Carter  
Corvallis, OR

**From:** [Jenny Pompilio](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Strengthen proposed 2023 climate rules  
**Date:** Wednesday, September 13, 2023 5:31:07 PM

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You don't often get email from [jpompilio@usa.net](mailto:jpompilio@usa.net). [Learn why this is important](#)

Dear DEQ,

As a physician, public health advocate, and mother, I am compelled to comment on DEQ's 2023 climate rule-making since it will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, and blatant industry influence on considerations around the rule-making, there could be very serious consequences if impacts to communities and the climate are not sufficiently considered.

I am upset that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process. Specifically, I am unhappy that current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane or hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of “book and claim” accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon.
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions

Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits—ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you,  
Jenny Pompilio MD, MPH

**From:** [Adam Logan](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Wednesday, September 13, 2023 8:27:57 PM

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You don't often get email from adamlogan@gmail.com. [Learn why this is important](#)

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane or hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of “book and claim” accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Adam Logan

**From:** [Dana Mozer](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Wednesday, September 13, 2023 9:01:56 PM

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You don't often get email from asknursedana@gmail.com. [Learn why this is important](#)

## Oregonians want the CPP to focus on the original goals of:

- **reducing greenhouse gas emissions** and other air pollutants, **maximizing public health** benefits, and **minimizing costs** for consumers in environmental justice and other communities in Oregon.
- keeping economic and health benefits of the Community Climate Investment program in Oregon: **investments should materially benefit Oregonians** rather than paying for cheap offsets in other places.
- **real reduction of emissions** by 50%, rather than allowing companies to invest in “renewable natural gas” (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
- **holding big polluters accountable** to engage in science-based “best available emissions reductions” (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.

Thank you for your work.

Sincerely

Dana Mozer  
Family Nurse Practitioner  
Portland, Oregon

**From:** [Lorie Fontaine](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Wednesday, September 13, 2023 10:50:12 PM

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Department of Environmental Quality

To get right to the point, we are on the verge of climate collapse. I have 2 precious little grandchildren who deserve a future, as do all of our children. Please do not undermine the integrity of the CPP. I ask you to amend the proposed rules by

- 1) Restricting bio methane or hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of “book and claim” accounting to only bio methane or hydrogen that is injected into a pipeline within Oregon; &
- 2) strengthening emissions, reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP’s Best Available Emissions Reduction program.

Thank you for considering the needs and best interests of Oregonians over the profits of the oil and gas industries.

Lorie Fontaine

Sent from my iPhone

**From:** [Andrew Morgan](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 6:05:28 AM

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You don't often get email from [andrewmorgan@fastmail.com](mailto:andrewmorgan@fastmail.com). [Learn why this is important](#)

Dear Commissioners,

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that the Department of Environmental Quality (DEQ)'s draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. For the CPP to deliver, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. Hydrogen is a leak-prone gas, and the risks of hydrogen leakage must be incorporated into our decision-making.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Best Available Emissions Reduction (BAER) assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Thank you for your consideration,

Sincerely,  
Andrew Morgan  
2775 NW 13th St  
Corvallis, OR 97330

**From:** [Jamie Shields](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking- Please strengthen proposed 2023 climate rules  
**Date:** Thursday, September 14, 2023 6:53:16 AM

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You don't often get email from [jfillmore66@gmail.com](mailto:jfillmore66@gmail.com). [Learn why this is important](#)

Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane or hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Jamie Shields  
Portland, OR

**From:** [Cindi Fuller](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Thursday, September 14, 2023 7:41:34 AM

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You don't often get email from [cindifuller@grsdelivery.com](mailto:cindifuller@grsdelivery.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Cindi Fuller  
810 Elm St  
Sweet Home, OR 97386

**From:** [Andrea Pellicani](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 8:10:11 AM

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To DEQ

Please strengthen your current rules by:

1. Restricting biomethane (aka renewable natural gas (RNG)) and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians.
2. Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction (BAER) program.

Andrea Pellicani  
artspace@sonic.net

**From:** [Janae Ojeda-Hutton](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Thursday, September 14, 2023 8:43:14 AM

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You don't often get email from janae71169@p2a.co. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Janaequa Ojeda-Hutton  
1200 Arcadia Dr, Apt, suite, floor, etc.  
OR 97401

**From:** [Katherine Brann Fredricks](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 8:44:09 AM

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I appreciate DEQ's action on climate. When I have contacted DEQ with questions, you have been very helpful. Thank you.

The 2023 Climate rules are definitely a step in the right direction. I urge you to go further towards meeting the Climate Protection Program (CPP) goals requiring 50% emissions reductions in Oregon's largest polluting facilities by 2035, providing direct economic and environmental benefits to frontline communities, and more.

Specifically, meeting the original CPP goals of:

- **reducing greenhouse gas emissions** and other air pollutants, **maximizing public health** benefits, and **minimizing costs** for consumers in environmental justice and other communities in Oregon.
- keeping economic and health benefits of the Community Climate Investment program in Oregon: **investments should materially benefit Oregonians** rather than paying for cheap offsets in other places.
- **real reduction of emissions** by 50%, rather than allowing companies to invest in “renewable natural gas” (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
- **holding big polluters accountable** to engage in science-based “best available emissions reductions” (BAER) from existing stationary sources and blocking development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.

Thank you,  
Katherine

**From:** [Sharon King](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Thursday, September 14, 2023 9:01:20 AM

---

You don't often get email from [sking227@forgrassroots.com](mailto:sking227@forgrassroots.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

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**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Sharon King  
5560 SW Bluestem Pl  
Corvallis, OR 97333

**From:** [Julianne Cullen](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Thursday, September 14, 2023 9:11:47 AM

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You don't often get email from [jcullen@advocacymessages.com](mailto:jcullen@advocacymessages.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Julianne Cullen  
St. Helens, OR 97051

**From:** [dgendvil@everyactioncustom.com](mailto:dgendvil@everyactioncustom.com) on behalf of [Derek Gendvil](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:07:27 AM

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Dear Oregon Department of Environmental Quality,

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As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Derek Gendvil  
9030 W Sahara Ave Pmb 36 Las Vegas, NV 89117-5744  
[dgendvil@gmail.com](mailto:dgendvil@gmail.com)

**From:** [carol@everyactioncustom.com](mailto:carol@everyactioncustom.com) on behalf of [Carol Wagner](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:08:33 AM

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Dear Oregon Department of Environmental Quality,

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Thank you.

Sincerely,  
Carol Wagner  
350 Timber Ridge St NE Albany, OR 97322-7436  
[carol@craftedbycarol.com](mailto:carol@craftedbycarol.com)

**From:** [dominic.laing@everyactioncustom.com](mailto:dominic.laing@everyactioncustom.com) on behalf of [Dominic Laing](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:09:05 AM

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Thank you.

Sincerely,  
Dominic Laing  
6831 N Albina Ave Portland, OR 97217-1601  
[dominic.laing@gmail.com](mailto:dominic.laing@gmail.com)

**From:** [cherinel@everyactioncustom.com](mailto:cherinel@everyactioncustom.com) on behalf of [Cherine Bauer](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:09:08 AM

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Thank you.

Sincerely,  
Cherine Bauer  
85 River Loop 1 Eugene, OR 97404-1704  
[cherinel@comcast.net](mailto:cherinel@comcast.net)

**From:** [birdcallahan@everyactioncustom.com](mailto:birdcallahan@everyactioncustom.com) on behalf of [Bridget Callahan](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:09:28 AM

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Thank you.

Sincerely,  
Bridget Callahan  
46781 Winfrey Rd Westfir, OR 97492-9725  
[birdcallahan@gmail.com](mailto:birdcallahan@gmail.com)

**From:** [elizabethdarby137@everyactioncustom.com](mailto:elizabethdarby137@everyactioncustom.com) on behalf of [Elizabeth Darby](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:09:54 AM

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Dear Oregon Department of Environmental Quality,

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Thank you.

Sincerely,  
Elizabeth Darby  
1020 NW 9th Ave Portland, OR 97209-3473  
[elizabethdarby137@gmail.com](mailto:elizabethdarby137@gmail.com)

**From:** [michellej2@everyactioncustom.com](mailto:michellej2@everyactioncustom.com) on behalf of [Michelle Jordan](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 DEQ Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:10:42 AM

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Dear Oregon Department of Environmental Quality,

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As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. I believe Oregon must lead the way for the rest of the country.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Michelle Jordan  
720 Avenue G Unit D Seaside, OR 97138-6624  
[michellej2@charter.net](mailto:michellej2@charter.net)

**From:** [brezebra@everyactioncustom.com](mailto:brezebra@everyactioncustom.com) on behalf of [Joseph Breazeale](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:11:54 AM

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Thank you.

Sincerely,  
Joseph Breazeale  
863 Wrights Creek Dr Ashland, OR 97520-1662  
[brezebra@yahoo.com](mailto:brezebra@yahoo.com)

**From:** [nfeyma@everyactioncustom.com](mailto:nfeyma@everyactioncustom.com) on behalf of [Nathaniel Feyma](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:12:34 AM

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Thank you.

Sincerely,  
Nathaniel Feyma  
845 Greg Way Eugene, OR 97404-2205  
[nfeyma@gmail.com](mailto:nfeyma@gmail.com)

**From:** [ladory411@everyactioncustom.com](mailto:ladory411@everyactioncustom.com) on behalf of [La Dory](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:13:13 AM

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Sincerely,  
La Dory  
1800 Lakewood Ct Spc 181 Eugene, OR 97402-1677  
[ladory411@yahoo.com](mailto:ladory411@yahoo.com)

**From:** [jprikitin@everyactioncustom.com](mailto:jprikitin@everyactioncustom.com) on behalf of [joshua.prikitin](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:13:39 AM

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Thank you.

Sincerely,  
joshua.prikitin  
8074 Thunderhead Ave White City, OR 97503-1549  
[jprikitin@pobox.com](mailto:jprikitin@pobox.com)

**From:** [bcascadascrane@everyactioncustom.com](mailto:bcascadascrane@everyactioncustom.com) on behalf of [Bobbi Crane-Olsen](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:13:56 AM

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Thank you.

Sincerely,  
Bobbi Crane-Olsen  
9570 N Lombard St Portland, OR 97203-2110  
[bcascadascrane@gmail.com](mailto:bcascadascrane@gmail.com)

**From:** [perrykara@everyactioncustom.com](mailto:perrykara@everyactioncustom.com) on behalf of [Kara Perry](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:13:59 AM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking.

There is nothing more important than accelerating the reduction of pollution in our environment. Scientists are increasingly sounding major alarms. We need to sacrifice now to protect the future of our children.

The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18-month rulemaking and stakeholder engagement process.

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Thank you.

Sincerely,  
Kara Perry  
3206 SE 63rd Ave Portland, OR 97206-1904  
[perrykara@yahoo.com](mailto:perrykara@yahoo.com)

**From:** [bcshelby@everyactioncustom.com](mailto:bcshelby@everyactioncustom.com) on behalf of [BC Shelby](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:14:17 AM

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Dear Oregon Department of Environmental Quality,

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Thank you.

Sincerely,  
BC Shelby  
1040 NW 10th Ave Apt 525 Portland, OR 97209-3464  
[bcshelby@gmail.com](mailto:bcshelby@gmail.com)

**From:** [natureboy92552@everyactioncustom.com](mailto:natureboy92552@everyactioncustom.com) on behalf of [Philip Fraser](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:14:29 AM

---

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Thank you.

Sincerely,  
Philip Fraser  
PO Box 818 San Juan Capistrano, CA 92693-0818  
[natureboy92552@gmail.com](mailto:natureboy92552@gmail.com)

**From:** [sallymaish@everyactioncustom.com](mailto:sallymaish@everyactioncustom.com) on behalf of [Sally Maish](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:14:31 AM

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Thank you.

Sincerely,  
Sally Maish  
987 Gem Dr Roseburg, OR 97471-9716  
[sallymaish@yahoo.com](mailto:sallymaish@yahoo.com)

**From:** [nate@everyactioncustom.com](mailto:nate@everyactioncustom.com) on behalf of [Nate Hildebrand](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:15:00 AM

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Dear Oregon Department of Environmental Quality,

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Sincerely,  
Nate Hildebrand  
235 NE Ivy St Portland, OR 97212-2041  
[nate@innategraphix.com](mailto:nate@innategraphix.com)

**From:** [aliciaschubert@everyactioncustom.com](mailto:aliciaschubert@everyactioncustom.com) on behalf of [Alicia Schubert](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:15:34 AM

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Thank you.

Sincerely,  
Alicia Schubert  
15585 NW Melody Ln Beaverton, OR 97006-5306  
[aliciaschubert@frontier.com](mailto:aliciaschubert@frontier.com)

**From:** [jknowles@everyactioncustom.com](mailto:jknowles@everyactioncustom.com) on behalf of [JoAnne Knowles](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:16:53 AM

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Dear Oregon Department of Environmental Quality,

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Thank you.

Sincerely,  
JoAnne Knowles  
4100 SE Woodward St Portland, OR 97202-1671  
[jknowles@iinet.com](mailto:jknowles@iinet.com)

**From:** [stan@everyactioncustom.com](mailto:stan@everyactioncustom.com) on behalf of [Stan Chesshir](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:17:16 AM

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Thank you.

Sincerely,  
Stan Chesshir  
1987 SW 13th Ave Portland, OR 97201-3223  
[stan@chesshirarchitecture.com](mailto:stan@chesshirarchitecture.com)

**From:** [care4animals@everyactioncustom.com](mailto:care4animals@everyactioncustom.com) on behalf of [Vic Bostock](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:18:04 AM

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Sincerely,  
Vic Bostock  
1612 Woodglen Ln Altadena, CA 91001-1819  
[care4animals@hotmail.co.uk](mailto:care4animals@hotmail.co.uk)

**From:** [ianjs@everyactioncustom.com](mailto:ianjs@everyactioncustom.com) on behalf of [Ian Shelley](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:19:32 AM

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Thank you.

Sincerely,  
Ian Shelley  
50 SW 97th Ave Portland, OR 97225-6902  
[ianjs@comcast.net](mailto:ianjs@comcast.net)

**From:** [mfwherley@everyactioncustom.com](mailto:mfwherley@everyactioncustom.com) on behalf of [Michael Wherley](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:19:49 AM

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Sincerely,  
Michael Wherley  
952 W 4th Ave Eugene, OR 97402-4931  
[mfwherley@gmail.com](mailto:mfwherley@gmail.com)

**From:** [jewolfgreve@everyactioncustom.com](mailto:jewolfgreve@everyactioncustom.com) on behalf of [Juan Eduardo Wolf](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:20:59 AM

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Sincerely,  
Juan Eduardo Wolf  
353 Garth Ln Eugene, OR 97404-3063  
[jewolfgreve@gmail.com](mailto:jewolfgreve@gmail.com)

**From:** [brent\\_rocks@everyactioncustom.com](mailto:brent_rocks@everyactioncustom.com) on behalf of [Brent Rocks](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:22:01 AM

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Sincerely,  
Brent Rocks  
1518 SW Upper Hall St Portland, OR 97201-6132  
[brent\\_rocks@comcast.net](mailto:brent_rocks@comcast.net)

**From:** [britney992@everyactioncustom.com](mailto:britney992@everyactioncustom.com) on behalf of [Britney VanCitters](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:22:12 AM

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Sincerely,  
Britney VanCitters  
6115 SE 87th Ave Portland, OR 97266-5325  
[britney992@gmail.com](mailto:britney992@gmail.com)

**From:** [chris@everyactioncustom.com](mailto:chris@everyactioncustom.com) on behalf of [Chris Smith](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:23:41 AM

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Thank you.

Sincerely,  
Chris Smith  
2343 NW Pettygrove St Portland, OR 97210-2609  
[chris@chrissmith.us](mailto:chris@chrissmith.us)

**From:** [obrien@everyactioncustom.com](mailto:obrien@everyactioncustom.com) on behalf of [Mike O'Brien](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:23:47 AM

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I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Mike O'Brien  
1905 N Alberta St Portland, OR 97217-3539  
[obrien@hevanet.com](mailto:obrien@hevanet.com)

**From:** [kurtles20002000@everyactioncustom.com](mailto:kurtles20002000@everyactioncustom.com) on behalf of [Amanda Robinson](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:24:07 AM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Amanda Robinson  
4935 13th Ave NE Keizer, OR 97303-3815  
[kurtles20002000@yahoo.com](mailto:kurtles20002000@yahoo.com)

**From:** [petersergienko@everyactioncustom.com](mailto:petersergienko@everyactioncustom.com) on behalf of [Peter Sergienko](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:24:14 AM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking.

As a long-time advocate for action to prevent dangerous climate change, I strongly support the Climate Protection Program (CPP), which is absolutely essential to achieving our state's climate pollution reduction goals. Moreover, it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP by allowing regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to ensure that Oregon stays on track to achieve our climate goals, to maximize the associated job creation, cost saving, public health, and economic development benefits from the rules, and to ensure that benefits flow to Oregon communities first, and are not exported out of state.

Thank you.

Sincerely,  
Peter Sergienko  
2127 NW Irving St Apt 101 Portland, OR 97210-5242  
[petersergienko@gmail.com](mailto:petersergienko@gmail.com)

**From:** [yourenjoseph@everyactioncustom.com](mailto:yourenjoseph@everyactioncustom.com) on behalf of [Joseph Youren](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:26:31 AM

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Dear Oregon Department of Environmental Quality,

I implore you to reject DEQ's proposed rules that would cripple the Climate Protection Program. You knew when you adopted the CPP that industrial polluters would scream and cry but please remember the overwhelming public support it garnered. Oregonians recognize the need for bold actions in the form of strong regulations. Please demonstrate a sense of urgency in your work to address the dangers of climate change.

Please demonstrate the requisite leadership and direct DEQ to amend the proposed rules and to ensure that Oregon can make significant real progress in achieving our climate goals.

Thank you.

Sincerely,  
Joseph Youren  
5584 Sugar Plum St SE Salem, OR 97306-1234  
[yourenjoseph@gmail.com](mailto:yourenjoseph@gmail.com)

**From:** [bigtoys70@everyactioncustom.com](mailto:bigtoys70@everyactioncustom.com) on behalf of [David Maceira](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:29:06 AM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
David Maceira  
2356 Benjamin Ave NW Salem, OR 97304-2543  
[bigtoys70@hotmail.com](mailto:bigtoys70@hotmail.com)

**From:** [phillip\\_callaway@everyactioncustom.com](mailto:phillip_callaway@everyactioncustom.com) on behalf of [Phillip Callaway](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:29:09 AM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Phillip Callaway  
PO Box 243 Crawfordsville, OR 97336-0243  
[phillip\\_callaway@msn.com](mailto:phillip_callaway@msn.com)

**From:** [terry.e.jess@everyactioncustom.com](mailto:terry.e.jess@everyactioncustom.com) on behalf of [Terry Jess](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:29:51 AM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. I reiterate, " These emissions reductions can provide significant economic benefits by encouraging technological innovation and investments in clean energy, which will support job creation." Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state. In conclusion, I say again, " These emissions reductions can provide significant economic benefits by encouraging technological innovation and investments in clean energy, which will support job creation."

Thank you.

Sincerely,  
Terry Jess  
955 5th Ave SW Albany, OR 97321-1907  
[terry.e.jess@gmail.com](mailto:terry.e.jess@gmail.com)

**From:** [2016denpat@everyactioncustom.com](mailto:2016denpat@everyactioncustom.com) on behalf of [Dennis West](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:31:45 AM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

CORPORATE AMERICA HAS BEEN IGNORING AND LYING FOR 60 YEARS ABOUT GLOBAL WARMING DANGER TO CONTINUE MAKING BILLIONS OF DOLLARS YEARLY BECAUSE THEY APPROVE OF GREED MORE THAN TAKING CARE OF US CITIZENS THAT MAKE THAT BILLIONS A YEAR FOR THEM! DON'T LET THEM CONTINUE MURDERING US FOR THEIR GREED AND CONTROL!

IF ANYONE DESERVES DEPORTED IT'S THE TRAITORS IN AND OUT OF GOVERNMENT!!

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Dennis West  
284 Lemwick Ln Yachats, OR 97498-8431  
[2016denpat@gmail.com](mailto:2016denpat@gmail.com)

**From:** [julieju@everyactioncustom.com](mailto:julieju@everyactioncustom.com) on behalf of [Julie Masters](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:33:51 AM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

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I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Julie Masters  
3580 SE Dockside Dr Corvallis, OR 97333-9296  
[julieju@mailnew.com](mailto:julieju@mailnew.com)

**From:** [sporadic@everyactioncustom.com](mailto:sporadic@everyactioncustom.com) on behalf of [Jimmy Shaw](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:34:11 AM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Jimmy Shaw  
3039 SE Merriweather Dr Hillsboro, OR 97123-8147  
[sporadic@usa.net](mailto:sporadic@usa.net)

**From:** [hanasofia.sant@everyactioncustom.com](mailto:hanasofia.sant@everyactioncustom.com) on behalf of [Hana Sant](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:35:57 AM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

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As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Hana Sant  
2836 NE 7th Ave Portland, OR 97212-3121  
[hanasofia.sant@gmail.com](mailto:hanasofia.sant@gmail.com)

**From:** [caverga1521@everyactioncustom.com](mailto:caverga1521@everyactioncustom.com) on behalf of [Carol Verga](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:38:16 AM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

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As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Carol Verga  
13505 SE River Rd # 8404 Portland, OR 97222-8038  
[caverga1521@gmail.com](mailto:caverga1521@gmail.com)

**From:** [crhutch@everyactioncustom.com](mailto:crhutch@everyactioncustom.com) on behalf of [CR Hutchison](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:38:19 AM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
CR Hutchison  
PO Box 489 Yamhill, OR 97148-0489  
[crhutch@onlinenw.com](mailto:crhutch@onlinenw.com)

**From:** [shanachie@everyactioncustom.com](mailto:shanachie@everyactioncustom.com) on behalf of [John Duggan](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:38:52 AM

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Dear Oregon Department of Environmental Quality,

Climate change is the leading issue of the day. Ignoring scientific warnings, humans have continued to pollute the Earth. Now any government attempt to improve the situation is fought against by the very people who caused the problem. Oregon is one of the greenest states in the nation and this new rulemaking helps our forests, our economy and our health.

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

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I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits—ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
John Duggan  
5505 Forest Creek Rd Jacksonville, OR 97530-9790  
[shanachie@hughes.net](mailto:shanachie@hughes.net)

**From:** [solacdncs@everyactioncustom.com](mailto:solacdncs@everyactioncustom.com) on behalf of [Juanita Rinas](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:38:57 AM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

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I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Juanita Rinas  
975 Lewis Ave Eugene, OR 97402-4270  
[solacdncs@yahoo.com](mailto:solacdncs@yahoo.com)

**From:** [bnew1@everyactioncustom.com](mailto:bnew1@everyactioncustom.com) on behalf of [Bonnie New](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:39:07 AM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking.

I urge the DEQ in the strongest possible way to keep Oregon's CPP on track to deliver its stated climate goals and associated benefits for public health, employment, environmental justice, and the economy.

We absolutely **MUST** achieve the state's climate pollution reduction goals, and the CPP is our tool to do that. It was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process, and should not be derailed by the repeated and heavily-funded complaints of polluters. **WE ARE FAR PAST THE TIME TO MAKE CONCESSIONS TO PROFITEERS WHILE OUR FUTURE AND THAT OF OUR DEPENDENTS CRUMBLE UNDER CLIMATE CHANGE.**

DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. This of course undermines the CPP. **CAN NOT DO. THE PULIC SAYS NO. WE ARE SUFFERING. WE ARE IN CRISIS. WE NEED YOU TO PUT IN PLACE GUARDRAILS FOR REGULATED ENTITIES TO COMPLY WITH OREGON'S CPP.**

I strongly urge DEQ to keep a strong CPP for the benefit of the people of Oregon, not weaken it for the \$\$\$ benefit of the few.

Thank you.

Sincerely,  
Bonnie New  
4045 Stonegate Dr Hood River, OR 97031-7752  
[bnew1@live.com](mailto:bnew1@live.com)

**From:** [bendher63@everyactioncustom.com](mailto:bendher63@everyactioncustom.com) on behalf of [Linda Hendrix](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:39:22 AM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Linda Hendrix  
104 SE Airpark Dr Bend, OR 97702-2491  
[bendher63@gmail.com](mailto:bendher63@gmail.com)

**From:** [jorysings@everyactioncustom.com](mailto:jorysings@everyactioncustom.com) on behalf of [Jory Aronson](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:39:56 AM

---

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

It's already too little, too late. Climate Change is happening at an extremely alarming rate. I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I STRONGLY urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Jory Aronson  
2145 NE 79th Ave Portland, OR 97213-6615  
[jorysings@aol.com](mailto:jorysings@aol.com)

**From:** [llblackstone@everyactioncustom.com](mailto:llblackstone@everyactioncustom.com) on behalf of [Linore Blackstone](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:40:21 AM

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Dear Oregon Department of Environmental Quality,

I am concerned that management and adherence to CPP will fall under the un-public management by administrative rule which is hidden from the public and fraught with potential for mischief. Amendments provide the opportunity to gut any true programs to mitigate the harm done by us. Why must we continue this thrust towards climate and earth collapse? Show some courage and integrity.

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Linore Blackstone  
1745 NE 49th Ave Portland, OR 97213-2025  
[llblackstone@comcast.net](mailto:llblackstone@comcast.net)

**From:** [susanwechsler@everyactioncustom.com](mailto:susanwechsler@everyactioncustom.com) on behalf of [Susan Wechsler](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:42:04 AM

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[You don't often get email from [susanwechsler@everyactioncustom.com](mailto:susanwechsler@everyactioncustom.com). Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Susan Wechsler  
1820 NE Vine Ave Corvallis, OR 97330-9207  
[susanwechsler@comcast.net](mailto:susanwechsler@comcast.net)

**From:** [kris@everyactioncustom.com](mailto:kris@everyactioncustom.com) on behalf of [Kristi DeSylvia](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:42:13 AM

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[You don't often get email from [kris@everyactioncustom.com](mailto:kris@everyactioncustom.com). Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Oregon Department of Environmental Quality,

This issue is extremely important to me. Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Kristi DeSylvia  
7931 NE Halsey St Ste 309 Portland, OR 97213-6753  
[kris@wtpdx.com](mailto:kris@wtpdx.com)

**From:** [charlenewhiting@everyactioncustom.com](mailto:charlenewhiting@everyactioncustom.com) on behalf of [Charlene Whiting](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:43:26 AM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking.

I am concerned that DEQ's current proposed rules regarding Oregon's Climate Protection Program (CPP) - which was adopted with overwhelming public support- requires big polluters to drastically cut their emissions over time by 2050.

The CPP is one of our strongest climate policies, and it's currently under attack, threatened by attempted rollbacks by polluting industries, leaving us with far-reaching consequences for the climate and our communities. The rollbacks would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Charlene Whiting  
734 S Water St Silverton, OR 97381-2340  
[charlenewhiting@gmail.com](mailto:charlenewhiting@gmail.com)

**From:** [leed8351@everyactioncustom.com](mailto:leed8351@everyactioncustom.com) on behalf of [Lee Davis](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:45:04 AM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Lee Davis  
7164 SW Oleson Rd Apt 23 Portland, OR 97223-7482  
[leed8351@gmail.com](mailto:leed8351@gmail.com)

**From:** [pamryans25@everyactioncustom.com](mailto:pamryans25@everyactioncustom.com) on behalf of [Andrew Jackson](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:46:30 AM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Andrew Jackson  
14131 Bishop Bend Ln Houston, TX 77047-4540  
[pamryans25@comcast.net](mailto:pamryans25@comcast.net)

**From:** [mmackill@everyactioncustom.com](mailto:mmackill@everyactioncustom.com) on behalf of [Mary MacKillop](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:47:10 AM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Mary MacKillop  
3517 NE Shaver St Portland, OR 97212-1866  
[mmackill@yahoo.com](mailto:mmackill@yahoo.com)

**From:** [coastgreen1@everyactioncustom.com](mailto:coastgreen1@everyactioncustom.com) on behalf of [Will Watson](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:47:46 AM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Will Watson  
2233 Dakota St Eugene, OR 97402-6222  
[coastgreen1@yahoo.com](mailto:coastgreen1@yahoo.com)

**From:** [martha.neuringer@everyactioncustom.com](mailto:martha.neuringer@everyactioncustom.com) on behalf of [Martha Neuringer](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:50:43 AM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Martha Neuringer  
25150 NW Ridge Rd Forest Grove, OR 97116-9268  
[martha.neuringer@gmail.com](mailto:martha.neuringer@gmail.com)

**From:** [janebeepee@everyactioncustom.com](mailto:janebeepee@everyactioncustom.com) on behalf of [Jane Burch-Pesses](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** Climate Rulemaking for Oregon's Climate Protection Program  
**Date:** Thursday, September 14, 2023 10:53:10 AM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely and unquestionably essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process. It has the support of the citizens of Oregon.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP.

Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By totally undermining the integrity of the CPP, the current proposed rule amendments will severely and intolerably compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. There is NO JUSTIFIABLE REASON to weaken this excellent program.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Jane Burch-Pesses  
5598 SE Sierra St Hillsboro, OR 97123-7863  
[janebeepee@gmail.com](mailto:janebeepee@gmail.com)

**From:** [randch13@everyactioncustom.com](mailto:randch13@everyactioncustom.com) on behalf of [Rick Hammond](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:53:37 AM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Rick Hammond  
23420 SE Franquette Dr Amity, OR 97101-2434  
[randch13@icloud.com](mailto:randch13@icloud.com)

**From:** [sleethdesign@everyactioncustom.com](mailto:sleethdesign@everyactioncustom.com) on behalf of [Marsha Sleeth](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:54:16 AM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Marsha Sleeth  
2020 NW Northrup St Apt 219 Portland, OR 97209-1637  
[sleethdesign@att.net](mailto:sleethdesign@att.net)

**From:** [jnewcomer@everyactioncustom.com](mailto:jnewcomer@everyactioncustom.com) on behalf of [James Newcomer](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 11:02:44 AM

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Dear Oregon Department of Environmental Quality,

The Climate Protection Program (CPP) is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP.

Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. If you were to undermine the integrity of the CPP, you would severely compromise the program's intended public health, economic, and employment goals, and thereby cancel benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

This rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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**THERE IS NOTHING MORE IMPORTANT TO OUR SURVIVAL AS HUMANS ON THE EARTH THAN STOPPING CLIMATE CHANGE,**

**ONLY GOVERNMENT BODIES CAN GIVE COMPANIES THE RULES THAT SPUR THEM TO CHANGE. GIVEN THE NATURE OF OUR SYSTEM, THEY CAN ONLY STRIVE TO SURVIVE WITHIN THE COMPETITIVE RULES THAT EXIST. ONLY GOVERNMENT BODIES SUCH AS DEQ CAN CHANGE THAT WHOLE LANDSCAPE.**

**YOU MUST ACT TO PRESERVE US HUMANS AND OUR CHILDREN.**

Thank you.

Sincerely,  
James Newcomer  
15245 Boones Way Lake Oswego, OR 97035-3582  
[jnewcomer@protonmail.com](mailto:jnewcomer@protonmail.com)

**From:** [last1le@everyactioncustom.com](mailto:last1le@everyactioncustom.com) on behalf of [V Robert Wallace](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 11:04:28 AM

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Dear Oregon Department of Environmental Quality,

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Thank you.

Sincerely,  
V Robert Wallace  
14560 Meade Rd Amelia Court House, VA 23002-4503  
[last1le@yahoo.com](mailto:last1le@yahoo.com)

**From:** [jlmackown@everyactioncustom.com](mailto:jlmackown@everyactioncustom.com) on behalf of [Linda MacKown](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 11:09:02 AM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

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Thank you.

Sincerely,  
Linda MacKown  
77 SE Yaquina View Dr Newport, OR 97365-9640  
[jlmackown@casco.net](mailto:jlmackown@casco.net)

**From:** [dianedalychavez@everyactioncustom.com](mailto:dianedalychavez@everyactioncustom.com) on behalf of [Diane Chavez](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 11:11:10 AM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As a grandparent the CPP is important to me and future generations. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

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Thank you.

Sincerely,  
Diane Chavez  
370 19th St NE Salem, OR 97301-4301  
[dianedalychavez@gmail.com](mailto:dianedalychavez@gmail.com)

**From:** [randallkoch1@everyactioncustom.com](mailto:randallkoch1@everyactioncustom.com) on behalf of [Randall Koch](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 11:12:06 AM

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Dear Oregon Department of Environmental Quality,

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Thank you.

Sincerely,  
Randall Koch  
8105 Slab Creek Rd Neskowin, OR 97149-9759  
[randallkoch1@me.com](mailto:randallkoch1@me.com)

**From:** [jeski@everyactioncustom.com](mailto:jeski@everyactioncustom.com) on behalf of [Mike Andrewjeski](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 11:16:02 AM

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Thank you.

Sincerely,  
Mike Andrewjeski  
3921 Dark Hollow Rd Medford, OR 97501-9624  
[jeski@sonic.net](mailto:jeski@sonic.net)

**From:** [tomrbpark@everyactioncustom.com](mailto:tomrbpark@everyactioncustom.com) on behalf of [Thomas Brandes](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 11:18:29 AM

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Thank you.

Sincerely,  
Thomas Brandes  
1080 E Park St Grants Pass, OR 97527-4915  
[tomrbpark@charter.net](mailto:tomrbpark@charter.net)

**From:** [rjones553@everyactioncustom.com](mailto:rjones553@everyactioncustom.com) on behalf of [Robert Jones](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 11:20:49 AM

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Thank you.

Sincerely,  
Robert Jones  
1976 Fairmount Ave S Salem, OR 97302-5212  
[rjones553@yahoo.com](mailto:rjones553@yahoo.com)

**From:** [bjcoast@everyactioncustom.com](mailto:bjcoast@everyactioncustom.com) on behalf of [Rebecca Crowder](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 11:23:05 AM

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Dear Oregon Department of Environmental Quality,

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Thank you.

Sincerely,  
Rebecca Crowder  
4420 Inwood Ln Eugene, OR 97405-2052  
[bjcoast@gmail.com](mailto:bjcoast@gmail.com)

**From:** [seeymh@everyactioncustom.com](mailto:seeymh@everyactioncustom.com) on behalf of [Rona Homer](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 11:28:59 AM

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Dear Oregon Department of Environmental Quality,

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Thank you.

Sincerely,  
Rona Homer  
24745 N 117th St Scottsdale, AZ 85255-5900  
[seeymh@aOL.COM](mailto:seeymh@aOL.COM)

**From:** [misstracyr@everyactioncustom.com](mailto:misstracyr@everyactioncustom.com) on behalf of [Tracy Richards](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 11:35:26 AM

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Dear Oregon Department of Environmental Quality,

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Thank you.

Sincerely,  
Tracy Richards  
13900 SE Highway 212 Unit 175 Clackamas, OR 97015-8418  
[misstracyr@yahoo.com](mailto:misstracyr@yahoo.com)

**From:** [bsand@everyactioncustom.com](mailto:bsand@everyactioncustom.com) on behalf of [Sandy Thompson](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 11:35:43 AM

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Dear Oregon Department of Environmental Quality,

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Thank you.

Sincerely,  
Sandy Thompson  
1940 NW Monterey Pines Dr Unit 1 Bend, OR 97703-5288  
[bsand@bendbroadband.com](mailto:bsand@bendbroadband.com)

**From:** [wendomere@everyactioncustom.com](mailto:wendomere@everyactioncustom.com) on behalf of [Wendy Holzman](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 11:37:16 AM

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Dear Oregon Department of Environmental Quality,

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I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

It is critical that we act now and stay on track to meet our climate goals!

Thank you.

Sincerely,  
Wendy Holzman  
61486 Hackleman Ct Bend, OR 97702-3560  
[wendomere@gmail.com](mailto:wendomere@gmail.com)

**From:** [bbenbaruch@everyactioncustom.com](mailto:bbenbaruch@everyactioncustom.com) on behalf of [Benjamin Ben-Baruch](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 11:38:02 AM

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Dear Oregon Department of Environmental Quality,

We have a climate crisis and the DEQ must act with the understanding that we are facing a crisis. In southwest Oregon we feel it in the very hot summer days, the wild fires and the smoke from the forest fires, and the drought conditions. We feel it in the changes in the growing seasons and harvest times. We need to strengthen the Climate Protection Program -- not weaken it!

So I Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

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As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Benjamin Ben-Baruch  
461 N Mountain Ave Ashland, OR 97520-1377  
[bbenbaruch@ashlandhome.net](mailto:bbenbaruch@ashlandhome.net)

**From:** [malcolm.costello@everyactioncustom.com](mailto:malcolm.costello@everyactioncustom.com) on behalf of [Malcolm Costello](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking - Please stay on track with Oregon's Climate Protection Program (CPP) rulings.  
**Date:** Thursday, September 14, 2023 11:40:25 AM

---

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Dear Oregon Department of Environmental Quality,

The CPP was adopted two years ago following a robust year-and-a-half long rulemaking process and extensive public input, including more than 7,600 public comments. I am concerned that DEQ's current proposed rules threaten to undermine this progress by enabling expansion of the fossil fuel industry in meeting Oregon's energy needs, severely compromising CPP's intended public health, economic, and employment goals and hindering progress towards environmental justice.

The emission reductions foreseen in the CPP can provide significant economic benefits by encouraging technological innovation and investments in clean energy, which will support regional job creation and deliverable public health benefits. I therefore strongly urge DEQ to amend the 2023 proposed rules to help ensure that Oregon stays on track to achieve the climate, health, and economic progress envisaged in the CPP.

Thank you.

Sincerely,  
Malcolm Costello  
3593 NW Mccready Dr Bend, OR 97703-8650  
[malcolm.costello@frontier.com](mailto:malcolm.costello@frontier.com)

**From:** [andersonjackjane@everyactioncustom.com](mailto:andersonjackjane@everyactioncustom.com) on behalf of [Jane Anderson](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 11:44:03 AM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the results of that progress.

As DEQ knows well, we are at a crucial climate crossroads. Although I fully understand the need to create more employment opportunities, especially in rural areas of the state, any decision made that increases a dependence on the use of more fossil fuels or the need to destroy already endangered habitat would be a deadly mistake - for all living things, us included.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve the necessary pollution and carbon reduction statewide and especially in those more vulnerable communities where industry so often refuses to listen to affected residents who are up against an imbalance of political power.

Thank you.

Sincerely,  
Jane Anderson  
PO Box 843 Garibaldi, OR 97118-0843  
[andersonjackjane@gmail.com](mailto:andersonjackjane@gmail.com)

**From:** [mschwebke@everyactioncustom.com](mailto:mschwebke@everyactioncustom.com) on behalf of [Mark Schwebke](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 11:46:19 AM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

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As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Mark Schwebke  
38954 Proctor Blvd Ste 393 Sandy, OR 97055-8039  
[mschwebke@gmail.com](mailto:mschwebke@gmail.com)

**From:** [mayfair9897@everyactioncustom.com](mailto:mayfair9897@everyactioncustom.com) on behalf of [James Fenner](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 11:46:27 AM

---

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Dear Oregon Department of Environmental Quality,

Thank you and members of the rule making committee for all the good work you have done thus far. Please continue to reject efforts to weaken the Climate Protection Program (CPP).

Many thousands of outdoor enthusiasts consider tighter rules essential for reaching Oregon's pollution reduction goals. Don't let your extensive year-and-a-half long rule making process go for nothing! Keep your eyes on the goal and do not let the pressure groups sway your results!

However, those same thousands of outdoor enthusiasts, as well as other environmental groups, are concerned that DEQ's current proposed rules would substantially undermine the CPP. In particular, it appears the current version of the proposed rules would allow gas utilities to rely on some non-Oregon based facilities, thus enabling some large industrial emitters to bypass climate pollution controls in Oregon. In other words, the current proposed rule amendments could severely decrease the CPP's ability to attain its intended public health, economic, and employment goals, and reduce benefits for Oregon consumers, workers, local economies.

Please make certain to create and maintain guardrails and pathways for regulated entities to comply with Oregon's CPP and in rule making. Please make sure it is done well to ensure Oregon stays on track to achieve adequate climate goals, and to deliver public health, economic, and employment benefits for all Oregonians!

Thank you.

Sincerely,  
James Fenner  
5765 Windfield Loop Lake Oswego, OR 97035-2203  
[mayfair9897@gmail.com](mailto:mayfair9897@gmail.com)

**From:** [robertthornhill14@everyactioncustom.com](mailto:robertthornhill14@everyactioncustom.com) on behalf of [Robert Thornhill](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 11:48:02 AM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

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I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Robert Thornhill  
13586 SE Nightingale Ave Happy Valley, OR 97015-7703  
[robertthornhill14@yahoo.com](mailto:robertthornhill14@yahoo.com)

**From:** [callie.bailey@everyactioncustom.com](mailto:callie.bailey@everyactioncustom.com) on behalf of [Callie Bailey](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 11:52:47 AM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking.

While I care about creating good jobs in Oregon, it's important that we site industrial activities where they are not a substantial environmental risk (IE, our oil port on liquification ground on the Willamette). It is also important that data centers offset or have a plan to buy clean energy. If we want to incentivize this type of use in areas that depend on fossil fuel- we need to provide tax incentives to offset the increased costs of clean energy, if we feel like its a vital industry to the future of Oregon for at least the next decade. If not- than we need to figure out what industrial uses/companies can meet our targets (solar or wind manufacturing?, lower intensity uses, etc). We need to keep our eye on the long game.

The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

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I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Callie Bailey  
4135 SE 28th Pl Portland, OR 97202-3515  
[callie.bailey@gmail.com](mailto:callie.bailey@gmail.com)

**From:** [nora.mattek@everyactioncustom.com](mailto:nora.mattek@everyactioncustom.com) on behalf of [Nora Polk](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 11:58:18 AM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

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I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Nora Polk  
6405 SE 62nd Ave Portland, OR 97206-6605  
[nora.mattek@gmail.com](mailto:nora.mattek@gmail.com)

**From:** [nlwineland@everyactioncustom.com](mailto:nlwineland@everyactioncustom.com) on behalf of [Nancy Wineland](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 12:00:35 PM

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Dear Oregon Department of Environmental Quality,

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Thank you.

Sincerely,  
Nancy Wineland  
5450 SW Erickson Ave Apt A118 Beaverton, OR 97005-4019  
[nlwineland@gmail.com](mailto:nlwineland@gmail.com)

**From:** [capt\\_werner@everyactioncustom.com](mailto:capt_werner@everyactioncustom.com) on behalf of [Kenneth Werner](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 12:00:49 PM

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Dear Oregon Department of Environmental Quality,

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Thank you.

Sincerely,  
Kenneth Werner  
275 N Broadway Apt 404 Coos Bay, OR 97420-2358  
[capt\\_werner@yahoo.com](mailto:capt_werner@yahoo.com)

**From:** [i2amrosanne@everyactioncustom.com](mailto:i2amrosanne@everyactioncustom.com) on behalf of [Ro Lewis](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 12:02:09 PM

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Dear Oregon Department of Environmental Quality,

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I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Do not give in to fossil fuel companies!

Thank you.

Sincerely,  
Ro Lewis  
3027 Adams Cir Medford, OR 97504-5878  
[i2amrosanne@yahoo.com](mailto:i2amrosanne@yahoo.com)

**From:** [dunecitymike@everyactioncustom.com](mailto:dunecitymike@everyactioncustom.com) on behalf of [Michael Herbert](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 12:05:05 PM

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Thank you.

Sincerely,  
Michael Herbert  
83558 Kiechle Arm Rd Florence, OR 97439-8340  
[dunecitymike@yahoo.com](mailto:dunecitymike@yahoo.com)

**From:** [wallymolly@everyactioncustom.com](mailto:wallymolly@everyactioncustom.com) on behalf of [Mary Lou Soscia](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 12:05:33 PM

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Dear Oregon Department of Environmental Quality,

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Thank you.

Sincerely,  
Mary Lou Soscia  
2115 NE 56th Ave Portland, OR 97213-3518  
[wallymolly@gmail.com](mailto:wallymolly@gmail.com)

**From:** [lgordon99@everyactioncustom.com](mailto:lgordon99@everyactioncustom.com) on behalf of [Louise Gordon](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 12:13:58 PM

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Dear Oregon Department of Environmental Quality,

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As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. Preventing further climate disaster should be our top priority and all of our resources need to be marshaled towards this goal. There is 0% room for further jeopardizing our climate. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Louise Gordon  
1828 SW Canby St Portland, OR 97219-2722  
[lgordon99@gmail.com](mailto:lgordon99@gmail.com)

**From:** [arthur.david.harold@everyactioncustom.com](mailto:arthur.david.harold@everyactioncustom.com) on behalf of [Arthur Harold](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 12:15:44 PM

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Dear Oregon Department of Environmental Quality,

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Thank you.

Sincerely,  
Arthur Harold  
1020 NW 9th Ave Portland, OR 97209-3473  
[arthur.david.harold@gmail.com](mailto:arthur.david.harold@gmail.com)

**From:** [RAN6711@everyactioncustom.com](mailto:RAN6711@everyactioncustom.com) on behalf of [Randy Harrison](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 12:18:30 PM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

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As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Randy Harrison  
4051 Wagner St Eugene, OR 97402-8725  
[RAN6711@COMCAST.NET](mailto:RAN6711@COMCAST.NET)

**From:** [bassmanron57@everyactioncustom.com](mailto:bassmanron57@everyactioncustom.com) on behalf of [Ronald Spies](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 12:20:18 PM

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Dear Oregon Department of Environmental Quality,

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Thank you.

Sincerely,  
Ronald Spies  
3640 Rocky Creek Ave Depoe Bay, OR 97341-9780  
[bassmanron57@yahoo.com](mailto:bassmanron57@yahoo.com)

**From:** [ginaguess971@everyactioncustom.com](mailto:ginaguess971@everyactioncustom.com) on behalf of [Gina Guess](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 12:20:40 PM

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Dear Oregon Department of Environmental Quality,

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I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Gina Guess  
17085 SW Vincent Ct Beaverton, OR 97078-1835  
[ginaguess971@gmail.com](mailto:ginaguess971@gmail.com)

**From:** [tazzannie975@everyactioncustom.com](mailto:tazzannie975@everyactioncustom.com) on behalf of [Ann E. Nowicki](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 12:23:34 PM

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Dear Oregon Department of Environmental Quality,

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Thank you.

Sincerely,  
Ann E Nowicki  
3355 N Delta Hwy Unit 170 Eugene, OR 97408-5915  
[tazzannie975@gmail.com](mailto:tazzannie975@gmail.com)

**From:** [katharinekehr818@everyactioncustom.com](mailto:katharinekehr818@everyactioncustom.com) on behalf of [katharine kehr](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 12:24:59 PM

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[You don't often get email from [katharinekehr818@everyactioncustom.com](mailto:katharinekehr818@everyactioncustom.com). Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Oregon Department of Environmental Quality,

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Thank you.

Sincerely,  
katharine kehr  
470 Florence Ave Sebastopol, CA 95472-3739  
[katharinekehr818@gmail.com](mailto:katharinekehr818@gmail.com)

**From:** [ocdiegodiva@everyactioncustom.com](mailto:ocdiegodiva@everyactioncustom.com) on behalf of [Deborah Burdick](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 12:32:12 PM

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[You don't often get email from [ocdiegodiva@everyactioncustom.com](mailto:ocdiegodiva@everyactioncustom.com). Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Oregon Department of Environmental Quality,

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Thank you.

Sincerely,  
Deborah Burdick  
2259 Saint Moritz Loop West Linn, OR 97068-8629  
[ocdiegodiva@gmail.com](mailto:ocdiegodiva@gmail.com)

**From:** [Karen Galloway](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Fwd: 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 12:43:44 PM

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**From:** **Karen Galloway** <[karengllwy@gmail.com](mailto:karengllwy@gmail.com)>  
**Date:** Thu, Sep 14, 2023 at 12:36 PM  
**Subject:** 2023 Climate Rulemaking  
**To:** <climate.2023@deq.oregon>

Hello,

I support CPP to focus on the original goals of reducing greenhouse gas emissions by 50%- this is a meaningful investment for all Oregonians and to hold polluters accountable.

The time is now. Please choose wisely and with our future at the center.

Thank you

Karen Galloway

**From:** [spitalerihandlin@everyactioncustom.com](mailto:spitalerihandlin@everyactioncustom.com) on behalf of [lynn handlin](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 12:46:36 PM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

Climate change is here and worse than expected. Now is the time to strengthen the CPP, not weaken it. Please do not cave to fossil fuel related business interests, they have done enough harm already, without paying the price. We Oregonians want a strong CPP, please make sure it isn't weakened in this process. My kids need you to do this, all future generations need this.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

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I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
lynn handlin  
8725 SE 152nd Ave Happy Valley, OR 97086-5795  
[spitalerihandlin@gmail.com](mailto:spitalerihandlin@gmail.com)

**From:** [jsingiser@everyactioncustom.com](mailto:jsingiser@everyactioncustom.com) on behalf of [John Singiser](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 12:50:37 PM

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Thank you.

Sincerely,  
John Singiser  
616 NE Fargo St Portland, OR 97212-2149  
[jsingiser@hotmail.com](mailto:jsingiser@hotmail.com)

**From:** [wallacelora@everyactioncustom.com](mailto:wallacelora@everyactioncustom.com) on behalf of [Lora Denman](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking request for support  
**Date:** Thursday, September 14, 2023 12:52:42 PM

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Thank you.

Sincerely,  
Lora Denman  
373 SE Baker Ave Gresham, OR 97080-2018  
[wallacelora@yahoo.com](mailto:wallacelora@yahoo.com)

**From:** [ingabird@everyactioncustom.com](mailto:ingabird@everyactioncustom.com) on behalf of [Ingrid Edstrom](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 12:53:54 PM

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Thank you.

Sincerely,  
Ingrid Edstrom  
7583 Highway 66 Ashland, OR 97520-9737  
[ingabird@hotmail.com](mailto:ingabird@hotmail.com)

**From:** [camilomarquezmd@everyactioncustom.com](mailto:camilomarquezmd@everyactioncustom.com) on behalf of [Camilo Marquez](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 12:54:50 PM

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Thank you.

Sincerely,  
Camilo Marquez  
2934 NE 60th Ave Portland, OR 97213-3910  
[camilomarquezmd@juno.com](mailto:camilomarquezmd@juno.com)

**From:** [doctor\\_luvtub@everyactioncustom.com](mailto:doctor_luvtub@everyactioncustom.com) on behalf of [Eric von Borstel](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 12:58:26 PM

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Thank you.

Sincerely,  
Eric von Borstel  
2515 E Santiam St Stayton, OR 97383-2192  
[doctor\\_luvtub@hotmail.com](mailto:doctor_luvtub@hotmail.com)

**From:** [lanny2228@everyactioncustom.com](mailto:lanny2228@everyactioncustom.com) on behalf of [Joanne Fredricks](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 1:08:28 PM

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Dear Oregon Department of Environmental Quality,

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Thank you.

Sincerely,  
Joanne Fredricks  
2203 SW Lava Ct Redmond, OR 97756-9013  
[lanny2228@bendbroadband.com](mailto:lanny2228@bendbroadband.com)

**From:** [marta@everyactioncustom.com](mailto:marta@everyactioncustom.com) on behalf of [Marta Boyett](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 1:26:27 PM

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[You don't often get email from [marta@everyactioncustom.com](mailto:marta@everyactioncustom.com). Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Oregon Department of Environmental Quality,

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Thank you.

Sincerely,  
Marta Boyett  
89819 Demming Rd Elmira, OR 97437-9618  
[marta@epud.net](mailto:marta@epud.net)

**From:** [ronm430@everyactioncustom.com](mailto:ronm430@everyactioncustom.com) on behalf of [Colonel Meyer](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 1:27:47 PM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Colonel Meyer  
3701 Eagle Pass St # 30 North Port, FL 34286-2009  
[ronm430@aol.com](mailto:ronm430@aol.com)

**From:** [markbishopart@everyactioncustom.com](mailto:markbishopart@everyactioncustom.com) on behalf of [Mark Bishop](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 1:38:27 PM

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[You don't often get email from [markbishopart@everyactioncustom.com](mailto:markbishopart@everyactioncustom.com). Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

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Thank you.

Sincerely,  
Mark Bishop  
18060 S Edgewood St Oregon City, OR 97045-9276  
[markbishopart@yahoo.com](mailto:markbishopart@yahoo.com)

**From:** [1949har@everyactioncustom.com](mailto:1949har@everyactioncustom.com) on behalf of [Harriet Shaklee](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 1:40:58 PM

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[You don't often get email from [1949har@everyactioncustom.com](mailto:1949har@everyactioncustom.com). Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Oregon Department of Environmental Quality,

You all worked hard to develop a strong CPP, yet there is pushback from businesses and organizations with less of a commitment to protecting our environment from global warming. Please hold firm on the rules as developed. We're all depending on you to protect the interests of the full community, not just those of a limited few.

Sincerely,  
Harriet Shaklee  
1816 N Watts St Portland, OR 97217-6616  
[1949har@gmail.com](mailto:1949har@gmail.com)

**From:** [meagansara@everyactioncustom.com](mailto:meagansara@everyactioncustom.com) on behalf of [Meagan Golec](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking - Please adopt the strongest environmental protections possible.  
**Date:** Thursday, September 14, 2023 1:40:58 PM

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Thank you.

Sincerely,  
Meagan Golec  
9234 N Buchanan Ave Portland, OR 97203-2435  
[meagansara@gmail.com](mailto:meagansara@gmail.com)

**From:** [schoonjm@everyactioncustom.com](mailto:schoonjm@everyactioncustom.com) on behalf of [John Schoonover](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 1:48:59 PM

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Dear Oregon Department of Environmental Quality,

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Thank you.

Sincerely,  
John Schoonover  
4143 SE 79th Ave Portland, OR 97206-3304  
[schoonjm@gmail.com](mailto:schoonjm@gmail.com)

**From:** [kfoster@everyactioncustom.com](mailto:kfoster@everyactioncustom.com) on behalf of [Karly Foster](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 1:50:04 PM

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Dear Oregon Department of Environmental Quality,

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As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you.

Sincerely,  
Karly Foster  
245 NW Florida Ave Bend, OR 97703-2846  
[kfoster@onda.org](mailto:kfoster@onda.org)

**From:** [prapportnd@everyactioncustom.com](mailto:prapportnd@everyactioncustom.com) on behalf of [Phyllis Rapport](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 1:52:02 PM

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Thank you.

Sincerely,  
Phyllis Rapport  
620 Morey Rd Talent, OR 97540-7751  
[prapportnd@yahoo.com](mailto:prapportnd@yahoo.com)

**From:** [chrisawills1@everyactioncustom.com](mailto:chrisawills1@everyactioncustom.com) on behalf of [Chris Frame](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 1:57:37 PM

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[You don't often get email from [chrisawills1@everyactioncustom.com](mailto:chrisawills1@everyactioncustom.com). Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Oregon Department of Environmental Quality,

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Thank you.

Sincerely,  
Chris Frame  
107 Rogue Blvd Grants Pass, OR 97526-4242  
[chrisawills1@gmail.com](mailto:chrisawills1@gmail.com)

**From:** [joni.holmes929@everyactioncustom.com](mailto:joni.holmes929@everyactioncustom.com) on behalf of [joan holmes](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 2:05:28 PM

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Thank you.

Sincerely,  
joan holmes  
2091 Fish Hatchery Rd Grants Pass, OR 97527-9500  
[joni.holmes929@gmail.com](mailto:joni.holmes929@gmail.com)

**From:** [jpn5710@everyactioncustom.com](mailto:jpn5710@everyactioncustom.com) on behalf of [John Nettleton](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 2:15:12 PM

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Thank you.

Sincerely,  
John Nettleton  
4311 SE 37th Ave Apt 21 Portland, OR 97202-3265  
[jpn5710@yahoo.com](mailto:jpn5710@yahoo.com)

**From:** [deninevh@everyactioncustom.com](mailto:deninevh@everyactioncustom.com) on behalf of [denine heinemann](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 2:17:31 PM

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Dear Oregon Department of Environmental Quality,

It is positively and absolutely ridiculous that, a state that claims to be so 'green' {and we're really not}, believes that it's a huge win that OR corporations will be cutting their emissions by 2050. So they have 27 years to keep polluting and we're just supposed to smile and wave and be grateful to them. ABSURD. This isn't a win for the environment by any means. It's still kowtowing to corporations and patting us on the head to placate us. You really want to help the environment, you'll have them cut pollution NOW.

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Thank you.

Sincerely,  
denine heinemann  
5531 N Commercial Ave Portland, OR 97217-2339  
[deninevh@yahoo.com](mailto:deninevh@yahoo.com)

**From:** [damsels\\_creaky.0j@everyactioncustom.com](mailto:damsels_creaky.0j@everyactioncustom.com) on behalf of [Stephen Bachhuber](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 2:20:56 PM

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This is no time to weaken climate goals. The severity of climate change is already apparent and no matter what we do it will get worse. The question is how much worse? Backsliding will lead to the most severe outcome. Do your part to keep it moderate.

Thank you.

Sincerely,  
Stephen Bachhuber  
3428 SE 9th Ave Portland, OR 97202-2717  
[damsels\\_creaky.0j@icloud.com](mailto:damsels_creaky.0j@icloud.com)

**From:** [michael.a.hughes1951@everyactioncustom.com](mailto:michael.a.hughes1951@everyactioncustom.com) on behalf of [Michael Hughes](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 2:31:16 PM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. .

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Sincerely,  
Michael Hughes  
2701 NW Rolling Green Dr Corvallis, OR 97330-3521  
[michael.a.hughes1951@gmail.com](mailto:michael.a.hughes1951@gmail.com)

**From:** [jkern@everyactioncustom.com](mailto:jkern@everyactioncustom.com) on behalf of [Jeffrey Kern](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 2:47:03 PM

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Dear Oregon Department of Environmental Quality,

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Thank you.

Sincerely,  
Jeffrey Kern  
203 Hawthorne Ave Eugene, OR 97404-3179  
[jkern@efn.org](mailto:jkern@efn.org)

**From:** [mjthiel1090@everyactioncustom.com](mailto:mjthiel1090@everyactioncustom.com) on behalf of [Mary Thiel](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 2:51:19 PM

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Sincerely,  
Mary Thiel  
6816 SE 86th Ave Portland, OR 97266-5650  
[mjthiel1090@gmail.com](mailto:mjthiel1090@gmail.com)

**From:** [blaineackley@everyactioncustom.com](mailto:blaineackley@everyactioncustom.com) on behalf of [Blaine Ackley](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 2:55:48 PM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Blaine Ackley  
655 NE 67th Ave Hillsboro, OR 97124-6572  
[blaineackley@me.com](mailto:blaineackley@me.com)

**From:** [mike.burmester625@everyactioncustom.com](mailto:mike.burmester625@everyactioncustom.com) on behalf of [Michael Burmester](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 2:59:12 PM

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[You don't often get email from [mike.burmester625@everyactioncustom.com](mailto:mike.burmester625@everyactioncustom.com). Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Oregon Department of Environmental Quality,

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Thank you.

Sincerely,  
Michael Burmester  
10829 SE Happy Valley Dr Happy Valley, OR 97086-6074  
[mike.burmester625@gmail.com](mailto:mike.burmester625@gmail.com)

**From:** [jandanbee@everyactioncustom.com](mailto:jandanbee@everyactioncustom.com) on behalf of [Dan and Mrs. Janet Blair](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** Comment on Climate Rulemaking in 2023  
**Date:** Thursday, September 14, 2023 3:06:11 PM

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Dear Oregon Department of Environmental Quality,

We thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving Oregon's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18-month rulemaking and stakeholder engagement process.

We are now concerned that DEQ's current proposed rules would effectively undermine the CPP:

Specifically, we're concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, thereby hindering benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

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For the reasons outlined above, we strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits – ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for giving these comments your most serious and thoughtful consideration.

Sincerely,  
Dan and Mrs. Janet Blair  
306 S College St # 330 Joseph, OR 97846-8518  
[jandanbee@gmail.com](mailto:jandanbee@gmail.com)

**From:** [robin@everyactioncustom.com](mailto:robin@everyactioncustom.com) on behalf of [Robin Dubay](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 3:22:28 PM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

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Thank you.

Sincerely,  
Robin Dubay  
2615 SW Luradel St Portland, OR 97219-6359  
[robin@lotsofbow.com](mailto:robin@lotsofbow.com)

**From:** [cmack@everyactioncustom.com](mailto:cmack@everyactioncustom.com) on behalf of [Chris Mack](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 3:23:29 PM

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Dear Oregon Department of Environmental Quality,

Do the right thing.

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

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Thank you.

Sincerely,  
Chris Mack  
15021 SE Robinette Ct Portland, OR 97267-3209  
[cmack@q.com](mailto:cmack@q.com)

**From:** [F2JP@everyactioncustom.com](mailto:F2JP@everyactioncustom.com) on behalf of [Frank J Perruccio](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 3:24:07 PM

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[You don't often get email from [f2jp@everyactioncustom.com](mailto:f2jp@everyactioncustom.com). Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

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Climate Change Catastrophes are very obviously human caused, and humans are, and will be the victims of our own doing. The only questions are:

Why are we so far behind in dealing with this crisis?  
How many people will die before we do address it?  
How many people will die in total?  
How many people that don't die will be seriously affected by it?  
Why is anyone even thinking about listening to the people/ entities that have contributed the most to the crisis?  
Why aren't they being forced to pay for the damage they've caused?

Thank you.

Sincerely,  
Frank J Perruccio  
26887 S Look Rd Colton, OR 97017-8610  
[F2JP@aol.com](mailto:F2JP@aol.com)

**From:** [David Zupan](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Citizen Comment on Climate Protection Program  
**Date:** Thursday, September 14, 2023 3:27:31 PM

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Hello DEQ Representatives:

We are strongly opposed to any weakening of the Climate Protection Program originally proposed by DEQ and approved by the Environmental Quality Commission. Instead we urge the following:

- 1) Ignore efforts by the gas utilities to bypass the Community Climate Investment fund.**
- 2) Insist that the Best Available Emissions Reduction rules keep industry on a downward trajectory in emissions.**
- 3) Encourage the position that only hydrogen produced through electrolysis using renewable energy should be acceptable.**

Thank you,

**David Zupan, Director**  
**Progressive Voices**  
**Cell: 541-525-6067**

**From:** [tstiffler@everyactioncustom.com](mailto:tstiffler@everyactioncustom.com) on behalf of [Tonya Stiffler](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 3:54:11 PM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

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I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Tonya Stiffler  
18051 Sunnyside Ave N Shoreline, WA 98133-4625  
[tstiffler@comcast.net](mailto:tstiffler@comcast.net)

**From:** [wobobr123@everyactioncustom.com](mailto:wobobr123@everyactioncustom.com) on behalf of [William Obrien](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 4:04:03 PM

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[You don't often get email from [wobobr123@everyactioncustom.com](mailto:wobobr123@everyactioncustom.com). Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Oregon Department of Environmental Quality,

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Thank you.

Sincerely,  
William Obrien  
12520 SW Gem Ln Apt 202 Beaverton, OR 97005-1360  
[wobobr123@yahoo.com](mailto:wobobr123@yahoo.com)

**From:** [cebruner@everyactioncustom.com](mailto:cebruner@everyactioncustom.com) on behalf of [cheryl bruner](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 4:07:47 PM

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Dear Oregon Department of Environmental Quality,

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Thank you.

Sincerely,  
cheryl bruner  
PO Box 493 Williams, OR 97544-0493  
[cebruner@hotmail.com](mailto:cebruner@hotmail.com)

**From:** [DANROXU@everyactioncustom.com](mailto:DANROXU@everyactioncustom.com) on behalf of [D.S](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 4:13:06 PM

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Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

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Thank you.

Sincerely,  
D S  
505 SW 139th Ave Beaverton, OR 97006-5840  
[DANROXU@yahoo.com](mailto:DANROXU@yahoo.com)

**From:** [feiffel@everyactioncustom.com](mailto:feiffel@everyactioncustom.com) on behalf of [Edith Montgomery](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 4:16:39 PM

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Dear Oregon Department of Environmental Quality,

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Thank you.

Sincerely,  
Edith Montgomery  
156 Blue Heron Ln Ashland, OR 97520-7312  
[feiffel@mind.net](mailto:feiffel@mind.net)

**From:** [wmusseriv@everyactioncustom.com](mailto:wmusseriv@everyactioncustom.com) on behalf of [William M. Musser IV](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 4:19:39 PM

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Thank you.

Sincerely,  
William M. Musser IV  
3225 NE 29th Ave Portland, OR 97212-2535  
[wmusseriv@icloud.com](mailto:wmusseriv@icloud.com)

**From:** [Teresa McFarland](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 4:40:09 PM

---

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Dear DEQ,

I live in Portland because of the city's strong commitment, at least on paper, to protecting the environment. I urge you to place the greatest possible restrictions on fossil fuel use and pollution. Isn't it obvious that we are ruining the entire ecosystem, including human civilization, through the use of fossil fuels? It is to many of us, and we need you to make rules that limit ALL use of fossil fuels now.

Thank you,

Dr. Teresa McFarland

10740 SW 11th Dr, Portland 97219

**From:** [herbalynn@everyactioncustom.com](mailto:herbalynn@everyactioncustom.com) on behalf of [Lynn Crowell](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 4:45:28 PM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process. I do not want to see it derailed.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

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Thank you.

Sincerely,  
Lynn Crowell  
1737 SW Songbird St McMinnville, OR 97128-7405  
[herbalynn@comcast.net](mailto:herbalynn@comcast.net)

**From:** [phil@everyactioncustom.com](mailto:phil@everyactioncustom.com) on behalf of [Phil Houston Goldsmith](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 4:49:55 PM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

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As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits—ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Phil Houston Goldsmith  
3110 NW 112th Pl Portland, OR 97229-4051  
[phil@lopqlaw.com](mailto:phil@lopqlaw.com)

**From:** [cnclm1@everyactioncustom.com](mailto:cnclm1@everyactioncustom.com) on behalf of [Craig Marburger](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 4:59:51 PM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Craig Marburger  
5606 S Riverside Ln Apt 5 Portland, OR 97239-5959  
[cnclm1@gmail.com](mailto:cnclm1@gmail.com)

**From:** [quietrecreation@everyactioncustom.com](mailto:quietrecreation@everyactioncustom.com) on behalf of [Randall Rasmussen](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 5:01:47 PM

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Dear Oregon Department of Environmental Quality,

I appreciate the opportunity to provide comment on DEQ's important 2023 climate rulemaking. I believe that the Climate Protection Program (CPP) is absolutely essential to achieving our state's climate pollution reduction goals. As you know, it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I share the concern that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I'm concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended goals for public health, economic, and employment, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

This rulemaking would have far-reaching and potentially negative adverse consequences for the climate and communities in Oregon. The need for guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – would be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but can also maximize the associated job creation, cost saving, public health, and economic development benefits—ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for this opportunity to submit public comments.

Sincerely,  
Randall Rasmussen  
7375 SW Deerhaven Dr Corvallis, OR 97333-9331  
[quietrecreation@gmail.com](mailto:quietrecreation@gmail.com)

**From:** [Kermit.donna@everyactioncustom.com](mailto:Kermit.donna@everyactioncustom.com) on behalf of [Donna Harris](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 5:13:08 PM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Donna Harris  
55785 Lost Rider Loop Bend, OR 97707-2728  
[Kermit.donna@gmail.com](mailto:Kermit.donna@gmail.com)

**From:** [artspace@everyactioncustom.com](mailto:artspace@everyactioncustom.com) on behalf of [Andrea Pellicani](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 5:21:55 PM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Andrea Pellicani  
1372 Washington Ave Coos Bay, OR 97420-1031  
[artspace@sonic.net](mailto:artspace@sonic.net)

**From:** [rhonda@everyactioncustom.com](mailto:rhonda@everyactioncustom.com) on behalf of [Rhonda Fry](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 5:30:26 PM

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Dear Oregon Department of Environmental Quality,

We should be willing to do what is necessary to ensure a livable Oregon for our grandchildren and great-grandchildren. Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits—ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Rhonda Fry  
126 NW Cottage St Newport, OR 97365-3708  
[rhonda@oceanafoods.org](mailto:rhonda@oceanafoods.org)

**From:** [gellenhare@everyactioncustom.com](mailto:gellenhare@everyactioncustom.com) on behalf of [Gail Hare](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 5:31:52 PM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Gail Hare  
24709 SE Rugg Rd Gresham, OR 97080-7353  
[gellenhare@gmail.com](mailto:gellenhare@gmail.com)

**From:** [canarskyomo@everyactioncustom.com](mailto:canarskyomo@everyactioncustom.com) on behalf of [Maurine Canarsky](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 5:33:06 PM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is an absolutely essential program to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules will undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Maurine Canarsky  
1977 SE 22nd Ave Portland, OR 97214-4851  
[canarskyomo@gmail.com](mailto:canarskyomo@gmail.com)

**From:** [Alan Journet](#)  
**To:** [TRAPP Lindsay \\* DEQ](#)  
**Subject:** Comments on the proposed CPP rules adjustment  
**Date:** Thursday, September 14, 2023 5:40:57 PM  
**Attachments:** [CPP adjustments final.pdf](#)  
[CPP adjustments CEE final.pdf](#)

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Lindsay:

I was planning to offer oral testimony today at the EQCmeeting but cannot do so tomorrow because I have appointments all morning.

Thus, please find attached comments submitted to DEQ on the proposed rule from Southern Oregon Climate Action Now plus comments from the Climate, Energy & Environment Team of the Consolidated Oregon Indivisible Network and the Congressional District 2 Indivisible group.

Thanks,

Alan

-----

Alan Journet  
Co-facilitator  
Southern Oregon Climate Action Now (SOCAN)  
<https://socan.eco>

541-301-4107 Cell  
541-500-2331 VOIP  
7113 Griffin Lane  
Jacksonville, OR 97530-9342  
[alanjournet@gmail.com](mailto:alanjournet@gmail.com) or  
[alan@socan.eco](mailto:alan@socan.eco)

**From:** [crrfran1936@everyactioncustom.com](mailto:crrfran1936@everyactioncustom.com) on behalf of [Frances Davis](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 5:41:06 PM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process. Please remember that.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. It is our health that is at risk without these safeguards in place.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Frances Davis  
8444 SW Crescent Pl Crooked River Ranch, OR 97760-9236  
[crrfran1936@gmail.com](mailto:crrfran1936@gmail.com)

**From:** [Rosemarie Gerstner](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 6:03:15 PM

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Thanks for the opportunity to comment. We should not loosen our regulations and rules in any way. Gas utilities must figure out how to comply with our current rules. Large industries must be held accountable for their emissions. We are in (climate) crisis and businesses must step up and comply with strict emissions standards. The people of Oregon are relying upon the DEQ to do what's best for ordinary people and the environment, not businesses.

Thank you,

Rose Gerstner  
5198 Sterling Creek Rd  
Jacksonville OR 97530  
541-899-3988  
[rosegerstner@gmail.com](mailto:rosegerstner@gmail.com)

**From:** [Sue Cole](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 climate rules  
**Date:** Thursday, September 14, 2023 6:07:10 PM

---

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Greetings, Department of Environmental Quality,

Please allow me to provide comment on DEQ's 2023 climate rulemaking, based on suggestions from the estimable Oregon Chapter of the Sierra Club.

By encouraging regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), careful rulemaking will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered.

It appears that DEQ's current proposed rules would effectively undermine the CPP— a program that is essential to achieving Oregon's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to discharge unregulated air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by

- 1) Restricting biomethane or hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing these things will help ensure that Oregon stays on track to achieve our climate goals, and maximize associated job creation, cost saving, public health, and economic

development benefits— ensuring that these help Oregon communities, and are not exported out of state.

Thank you for considering these comments.

Sue Cole

Eugene resident and concerned US citizen

**From:** [mscribe9@everyactioncustom.com](mailto:mscribe9@everyactioncustom.com) on behalf of [Maureen McCarthy](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 6:09:52 PM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Maureen McCarthy  
32 South St Marblehead, MA 01945-5515  
[mscribe9@yahoo.com](mailto:mscribe9@yahoo.com)

**From:** [amethystpurple1@everyactioncustom.com](mailto:amethystpurple1@everyactioncustom.com) on behalf of [Alan Lawrence](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 7:34:23 PM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Alan Lawrence  
6901 N Haight Ave Portland, OR 97217-1721  
[amethystpurple1@msn.com](mailto:amethystpurple1@msn.com)

**From:** [the\\_dunhams@everyactioncustom.com](mailto:the_dunhams@everyactioncustom.com) on behalf of [Marilyn Danese Dunham](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 7:37:59 PM

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[You don't often get email from the\_dunhams@everyactioncustom.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Oregon Department of Environmental Quality,

The Climate Protection Program (CPP) is absolutely essential to achieving our state's climate pollution reduction goals. Adopted with overwhelming public support, following an extensive 18 month rulemaking and stakeholder engagement process, it reflects Oregonians' commitment to protecting our people, our state's resources, and its many environs.

DEQ's current proposed rules would effectively undermine the CPP.

Specifically: one proposed rule allows regulated gas utilities to rely on out-of-state biomethane investments- like importing damaging gasses into our state would be a good thing.

Another proposal would allow expansion of new large industrial emitters, and likely unfettered climate pollution in Oregon. OREGONIANS DO NOT WANT UNFETTERED EMISSIONS. Enough with the wild West mentality already.

By undermining the integrity of the CPP, the current proposed amendments severely compromise the program's intended public health, economic, and employment goals, and hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. All for the profits of those out-of-state biomethane investors and large industrial emitters.

It's worth remembering that most large industries do not pay their share of taxes, but do rely on the government to pay for any damage they do to public health and lands.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Marilyn Danese Dunham  
9757 SW Arborcrest Way Portland, OR 97225-4216  
[the\\_dunhams@yahoo.com](mailto:the_dunhams@yahoo.com)

**From:** [purelyog@everyactioncustom.com](mailto:purelyog@everyactioncustom.com) on behalf of [robert albee](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 7:41:02 PM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

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As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits—ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
robert albee  
651 E Intervale Rd Grants Pass, OR 97527-9022  
[purelyog@gmail.com](mailto:purelyog@gmail.com)

**From:** [Joanne Cvar](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Thursday, September 14, 2023 8:02:25 PM

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Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

However, I was disappointed to hear that the recent rule-making table did not include community input, and also that the results lacked in meeting the plan's original goals of reducing greenhouse gas emissions by 50%, providing meaningful investments to benefit Oregonians, and holding big polluters accountable.

Therefore, I am calling on the DEQ to adapt the rules for CPP implementation to focus on the original goals of:

- 1) Reducing greenhouse gas emissions and other air pollutants, maximizing public health benefits, and minimizing costs for consumers in environmental justice and other communities in Oregon.
- 2) Keeping economic and health benefits of the Community Climate Investment program in Oregon: investments should materially benefit Oregonians at the frontlines of pollution and the climate crisis, rather than paying for cheap offsets in other places.
- 3) Achieving real reduction of emissions by 50%, rather than allowing companies to invest in biomass-derived fuels such as "renewable natural gas" (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
- 4) Holding big polluters accountable to engage in science-based "best available emissions reductions" (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.
- 5) Returning the date for a "new source" of stationary pollution to December 31, 2021.

The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
Joanne Cvar  
165 SE Rose St  
Waldport, OR 97394

**From:** [kenkebisek@everyactioncustom.com](mailto:kenkebisek@everyactioncustom.com) on behalf of [Ken Kebisek](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 8:03:19 PM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

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Thank you.

Sincerely,  
Ken Kebisek  
10986 SW Washington St Portland, OR 97225-6963  
[kenkebisek@frontier.com](mailto:kenkebisek@frontier.com)

**From:** [mariahball@everyactioncustom.com](mailto:mariahball@everyactioncustom.com) on behalf of [Charlotta Ball](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 8:12:17 PM

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Dear Oregon Department of Environmental Quality,

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Thank you.

Sincerely,  
Charlotta Ball  
237 SE 18th Ave Apt 202 Hillsboro, OR 97123-4597  
[mariahball@yahoo.com](mailto:mariahball@yahoo.com)

**From:** [rparkerperry@everyactioncustom.com](mailto:rparkerperry@everyactioncustom.com) on behalf of [Rebecca Parker](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 8:16:43 PM

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Dear Oregon Department of Environmental Quality,

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Thank you.

Sincerely,  
Rebecca Parker  
2630 NE Daggett Ln Bend, OR 97701-6423  
[rparkerperry@yahoo.com](mailto:rparkerperry@yahoo.com)

**From:** [cere7email@everyactioncustom.com](mailto:cere7email@everyactioncustom.com) on behalf of [Mary Lyda](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 8:26:23 PM

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Dear Oregon Department of Environmental Quality,

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Thank you.

Sincerely,  
Mary Lyda  
495 Glendon Rd # 558 Kerby, OR 97531-5002  
[cere7email@gmail.com](mailto:cere7email@gmail.com)

**From:** [djmccs@everyactioncustom.com](mailto:djmccs@everyactioncustom.com) on behalf of [Corinne Sherton](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 8:29:39 PM

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Dear Oregon Department of Environmental Quality,

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Thank you.

Sincerely,  
Corinne Sherton  
2213 Thrush Ct SE Salem, OR 97306-1007  
[djmccs@comcast.net](mailto:djmccs@comcast.net)

**From:** [usha.honeyman@everyactioncustom.com](mailto:usha.honeyman@everyactioncustom.com) on behalf of [Usha Honeyman](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 8:53:00 PM

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Thank you.

Sincerely,  
Usha Honeyman  
2645 SE Crystal Lake Dr Corvallis, OR 97333-2010  
[usha.honeyman@gmail.com](mailto:usha.honeyman@gmail.com)

**From:** [astheyare1376@everyactioncustom.com](mailto:astheyare1376@everyactioncustom.com) on behalf of [Sara Smith](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking - Oregon's actions are key for our planet  
**Date:** Thursday, September 14, 2023 8:55:51 PM

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Dear Oregon Department of Environmental Quality,

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Thank you.

Sincerely,  
Sara Smith  
PO Box 1376 Medford, OR 97501-0102  
[astheyare1376@gmail.com](mailto:astheyare1376@gmail.com)

**From:** [gshaff@everyactioncustom.com](mailto:gshaff@everyactioncustom.com) on behalf of [Gary Shaff](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 8:56:24 PM

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Dear Oregon Department of Environmental Quality,

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Thank you.

Sincerely,  
Gary Shaff  
516 Herbert St Ashland, OR 97520-3032  
[gshaff@gmail.com](mailto:gshaff@gmail.com)

**From:** [dalevirginia808@everyactioncustom.com](mailto:dalevirginia808@everyactioncustom.com) on behalf of [Dale Roberts](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 9:03:44 PM

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Thank you.

Sincerely,  
Dale Roberts  
13215 SW Shore Dr Portland, OR 97223-1585  
[dalevirginia808@gmail.com](mailto:dalevirginia808@gmail.com)

**From:** [marissawolfheart@everyactioncustom.com](mailto:marissawolfheart@everyactioncustom.com) on behalf of [Marissa Wolfheart](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 9:08:15 PM

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Thank you.

Sincerely,  
Marissa Wolfheart  
4409 SE 66th Ave Portland, OR 97206-3662  
[marissawolfheart@gmail.com](mailto:marissawolfheart@gmail.com)

**From:** [Christine Kondrat](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Thursday, September 14, 2023 9:11:11 PM

---

You don't often get email from [chris@kondrats.com](mailto:chris@kondrats.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

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Thank you for considering these comments and recommendations.

Sincerely,  
Christine Kondrat  
1445 NW 116th Ave  
Portland, OR 97229

**From:** [ibclcpof@everyactioncustom.com](mailto:ibclcpof@everyactioncustom.com) on behalf of [Esther Friedman](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 9:13:23 PM

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Sincerely,  
Esther Friedman  
4160 Hertel Dr S Salem, OR 97302-6173  
[ibclcpof@comcast.net](mailto:ibclcpof@comcast.net)

**From:** [budbeck3@everyactioncustom.com](mailto:budbeck3@everyactioncustom.com) on behalf of [Wallace Beck](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 9:21:14 PM

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Thank you.

Sincerely,  
Wallace Beck  
1828 NW 8th St McMinnville, OR 97128-5186  
[budbeck3@gmail.com](mailto:budbeck3@gmail.com)

**From:** [murdock\\_ls@everyactioncustom.com](mailto:murdock_ls@everyactioncustom.com) on behalf of [Lauren Murdock](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 9:21:21 PM

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Thank you.

Sincerely,  
Lauren Murdock  
3940 Via Lucero Santa Barbara, CA 93110-1669  
[murdock\\_ls@hotmail.com](mailto:murdock_ls@hotmail.com)

**From:** [chrisrose47@everyactioncustom.com](mailto:chrisrose47@everyactioncustom.com) on behalf of [Chris Bray](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 9:45:44 PM

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Thank you.

Sincerely,  
Chris Bray  
3731 Concomly Rd S Salem, OR 97306-9729  
[chrisrose47@aol.com](mailto:chrisrose47@aol.com)

**From:** [relynn53@everyactioncustom.com](mailto:relynn53@everyactioncustom.com) on behalf of [Renee Clark](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 9:55:12 PM

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Sincerely,  
Renee Clark  
1580 SE 19th St Apt E9 Lincoln City, OR 97367-2472  
[relynn53@gmail.com](mailto:relynn53@gmail.com)

**From:** [kevinrussell1958@everyactioncustom.com](mailto:kevinrussell1958@everyactioncustom.com) on behalf of [Kevin Russell](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** I support the Climate Protection Program.  
**Date:** Thursday, September 14, 2023 9:58:39 PM

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Sincerely,  
Kevin Russell  
1055 W 7th Ave Apt 5 Eugene, OR 97402-4651  
[kevinrussell1958@yahoo.com](mailto:kevinrussell1958@yahoo.com)

**From:** [prin@everyactioncustom.com](mailto:prin@everyactioncustom.com) on behalf of [Kris N.](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:02:28 PM

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Thank you.

Sincerely,  
Kris N.  
633 NE 68th Ave Portland, OR 97213-5523  
[prin@phoenixfi.com](mailto:prin@phoenixfi.com)

**From:** [skazz999w@everyactioncustom.com](mailto:skazz999w@everyactioncustom.com) on behalf of [Philip Ratcliff](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 10:16:03 PM

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Thank you.

Sincerely,  
Philip Ratcliff  
4665 Tragen Ct SE Salem, OR 97302-3533  
[skazz999w@hotmail.com](mailto:skazz999w@hotmail.com)

**From:** [sdelles@everyactioncustom.com](mailto:sdelles@everyactioncustom.com) on behalf of [Susan Delles](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 14, 2023 11:32:36 PM

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Sincerely,  
Susan Delles  
2801 Sykes Creek Rd Rogue River, OR 97537-9771  
[sdelles@jeffnet.org](mailto:sdelles@jeffnet.org)

**From:** [kathy.mitchell5232@everyactioncustom.com](mailto:kathy.mitchell5232@everyactioncustom.com) on behalf of [Kathleen Mitchell](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Friday, September 15, 2023 1:00:10 AM

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Sincerely,  
Kathleen Mitchell  
13505 SE River Rd Apt 73 Portland, OR 97222-8223  
[kathy.mitchell5232@gmail.com](mailto:kathy.mitchell5232@gmail.com)

**From:** [gscrooge@everyactioncustom.com](mailto:gscrooge@everyactioncustom.com) on behalf of [George Snipes](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Friday, September 15, 2023 1:00:37 AM

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Sincerely,  
George Snipes  
6934 SE 45th Ave Portland, OR 97206-7747  
[gscrooge@bluetiehome.com](mailto:gscrooge@bluetiehome.com)

**From:** [andyourbirdcansing18@everyactioncustom.com](mailto:andyourbirdcansing18@everyactioncustom.com) on behalf of [Allison Everitt](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Friday, September 15, 2023 1:56:09 AM

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Sincerely,  
Allison Everitt  
3285 Felina Ave NE Apt C Salem, OR 97301-2198  
[andyourbirdcansing18@gmail.com](mailto:andyourbirdcansing18@gmail.com)

**From:** [Jen Davis](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Friday, September 15, 2023 5:41:43 AM

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Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Jen Davis  
2332 SE Brooklyn St  
Portland, OR 97202

**From:** [eliza4garcia@everyactioncustom.com](mailto:eliza4garcia@everyactioncustom.com) on behalf of [Eliza Garcia](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Friday, September 15, 2023 5:47:18 AM

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Thank you.

Sincerely,  
Eliza Garcia  
403 W Umpqua St Roseburg, OR 97471-2949  
[eliza4garcia@gmail.com](mailto:eliza4garcia@gmail.com)

**From:** [Maya.Holzman@everyactioncustom.com](mailto:Maya.Holzman@everyactioncustom.com) on behalf of [MayaLisa.Holzman](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Friday, September 15, 2023 5:48:06 AM

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Thank you.

Sincerely,  
MayaLisa Holzman  
61486 Hackleman Ct Bend, OR 97702-3560  
[Maya.Holzman@gmail.com](mailto:Maya.Holzman@gmail.com)

**From:** [Patricia Nigh](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Friday, September 15, 2023 7:13:10 AM

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Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Patricia Nigh  
8445 SW 80th Ave  
Portland, OR 97223

**From:** [info@everyactioncustom.com](mailto:info@everyactioncustom.com) on behalf of [Bret Miller](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Friday, September 15, 2023 7:19:39 AM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Bret Miller  
311 N Mountain Ave Ashland, OR 97520-1228  
[info@atbagsend.com](mailto:info@atbagsend.com)

**From:** [Ziglerashland@everyactioncustom.com](mailto:Ziglerashland@everyactioncustom.com) on behalf of [Catherine Edwards](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Friday, September 15, 2023 7:26:46 AM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

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Thank you.

Sincerely,  
Catherine Edwards  
1920 Tyler Creek Rd Ashland, OR 97520-9790  
[Ziglerashland@gmail.com](mailto:Ziglerashland@gmail.com)

**From:** [dirtroadiva@everyactioncustom.com](mailto:dirtroadiva@everyactioncustom.com) on behalf of [Victoria Eells](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Friday, September 15, 2023 7:51:14 AM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Victoria Eells  
28049 Hunter Creek Rd Gold Beach, OR 97444  
[dirtroadiva@gmail.com](mailto:dirtroadiva@gmail.com)

**From:** [Carol Wagner](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Friday, September 15, 2023 8:31:07 AM

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Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

However, I was disappointed to hear that the recent rule-making table did not include community input, and also that the results lacked in meeting the plan's original goals of reducing greenhouse gas emissions by 50%, providing meaningful investments to benefit Oregonians, and holding big polluters accountable.

Therefore, I am calling on the DEQ to adapt the rules for CPP implementation to focus on the original goals of:

- 1) Reducing greenhouse gas emissions and other air pollutants, maximizing public health benefits, and minimizing costs for consumers in environmental justice and other communities in Oregon.
- 2) Keeping economic and health benefits of the Community Climate Investment program in Oregon: investments should materially benefit Oregonians at the frontlines of pollution and the climate crisis, rather than paying for cheap offsets in other places.
- 3) Achieving real reduction of emissions by 50%, rather than allowing companies to invest in biomass-derived fuels such as "renewable natural gas" (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
- 4) Holding big polluters accountable to engage in science-based "best available emissions reductions" (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.
- 5) Returning the date for a "new source" of stationary pollution to December 31, 2021.

The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
Carol Wagner  
350 Timber Ridge St NE  
Albany, OR 97322

**From:** [lynn1goody@everyactioncustom.com](mailto:lynn1goody@everyactioncustom.com) on behalf of [Catherine Goodfellow](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Friday, September 15, 2023 8:31:16 AM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Catherine Goodfellow  
322 Rebecca St Syracuse, NY 13212-2035  
[lynn1goody@yahoo.com](mailto:lynn1goody@yahoo.com)

**From:** [maleek.mckenzie](mailto:maleek.mckenzie)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Friday, September 15, 2023 9:08:55 AM

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Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane or hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of “book and claim” accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic

development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

**From:** [Kathy Moore](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Friday, September 15, 2023 9:30:43 AM

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Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And most importantly, these BAER assessments must be translated into concrete requirements to

reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Kathy Moore  
2403 Wayside Terrace NE  
Salem, OR 97301

**From:** [pamhow48@everyactioncustom.com](mailto:pamhow48@everyactioncustom.com) on behalf of [Pamela Howard](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Friday, September 15, 2023 9:46:48 AM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Pamela Howard  
2445 NW Westover Rd Unit 407 Portland, OR 97210-3155  
[pamhow48@gmail.com](mailto:pamhow48@gmail.com)

**From:** [Rene Braga](#)  
**To:** [TRAPP Lindsay \\* DEQ](#)  
**Subject:** complete Public Comment for EQC, DEQ Climate Rule Making  
**Date:** Friday, September 15, 2023 9:59:28 AM

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## Testimony for EQC, DEQ Climate Rule Making without the 2 minute limit

Good afternoon [**EQC**: Chair George, Vice Chair Baraso, members of the Commission].

My name is Rene Braga and I'm a community member that has suffered the loss of family and property due to global warming related disasters. Thank you for the chance to comment on DEQ's 2023 climate rulemaking. This process has significant implications for Oregon's climate and communities. It's crucial for this rulemaking to effectively set guidelines for compliance with the Climate Protection Program (CPP). When executed effectively, it will play a critical role in keeping Oregon on course to meet our climate objectives and bring benefits to environmental justice communities in terms of public health, the economy, and employment.

I'm deeply troubled by the current proposed rules from DEQ, as they appear to weaken the CPP. This program is absolutely crucial for achieving our state's climate pollution reduction objectives and was established with overwhelming public backing, after an exhaustive 18-month rulemaking and stakeholder engagement process.

The DEQ bears the crucial responsibility of safeguarding the alignment of the Climate Protection Program with its climate objectives, while concurrently delivering substantial public health, economic, and employment advantages to communities within Oregon. It is of paramount importance that the DEQ takes **substantial** measures to enhance the existing proposed regulations in the following ways:

1-Imposing stringent limitations on the utilization of biomethane, also known as renewable natural gas (RNG), and hydrogen for the purposes of CPP compliance, ensuring that these resources **exclusively** yield direct benefits for the residents of Oregon.

2-Bolstering the criteria for emissions reduction within new or expanded large-scale industrial facilities operating in Oregon under the CPP's Best Available Emissions Reduction (BAER) program.

And Last, Since the 2021 adoption of the final CPP rules, Oregon's industrial sector has witnessed a concerning rise in emissions. For instance, Amazon is pursuing multiple

permits for energy-intensive fossil gas-powered data centers in Eastern Oregon, which will significantly escalate gas consumption and greenhouse gas emissions. We demand the rules be updated, strengthened and always concentrated on looking out for the health of our communities and not the savings in revenue, of billion dollar corporations. Thank you

En Solidaridad,  
Rene Braga  
Rogue Valley Community Organizer



**Phone:** (786)416-1183

**Email:** [rene@uniteoregon.org](mailto:rene@uniteoregon.org)

**Pronouns:** Him, He, El

**Languages:** English, Spanish

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**From:** [teresas62@everyactioncustom.com](mailto:teresas62@everyactioncustom.com) on behalf of [Teresa Schader](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Friday, September 15, 2023 10:00:32 AM

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Dear Oregon Department of Environmental Quality,

We need to keep jobs, economic opportunities and environmental improvements in Oregon!

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Teresa Schader  
20846 Solstice Dr Bend, OR 97703-8405  
[teresas62@yahoo.com](mailto:teresas62@yahoo.com)

**From:** [danjoan@everyactioncustom.com](mailto:danjoan@everyactioncustom.com) on behalf of [Joan Kalvelage](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Friday, September 15, 2023 10:08:11 AM

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Dear Oregon Department of Environmental Quality,

As a citizen who advocated for the current CPP rules, I thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

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Thank you.

Sincerely,  
Joan Kalvelage  
810 Faith Ave Ashland, OR 97520-2515  
[danjoan@ccountry.net](mailto:danjoan@ccountry.net)

**From:** [Eric Butler](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Friday, September 15, 2023 10:08:57 AM

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Greetings,

I'm writing to comment on DEQ's proposed climate protection rules. While this is a strong set of proposals overall, which will help Oregon meet its climate goals, I would like to highlight the need for three areas of improvement:

First, RNG or biomethane, while potentially mitigating some carbon pollution, should not be considered a "renewable energy source" for export--this risks creating a perverse incentive for unsustainable methane producers such as confined livestock operations. Using this product for onsite or local energy production would be acceptable as long as it does not promote increased overall methane release.

Second, large stationary producers should be held to more stringent emissions standards when seeking permits for new or expanded facilities.

Finally, violators should be encouraged as strongly as possible to mitigate emissions and other violations either through self-initiated actions or through supplemental environmental projects; any possible incentives to turn penalties into meaningful solutions should be pursued.

Thank you,

Eric Butler

**From:** [Brian Stewart](#)  
**To:** [TRAPP Lindsay \\* DEQ](#)  
**Subject:** Comments to DEQ regarding CPP Rulemaking  
**Date:** Friday, September 15, 2023 10:16:54 AM  
**Attachments:** [Blue Dark Blue-01 Sm 2.png](#)

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Please accept these comments regarding the DEQs 2023 Climate Rulemaking.

My name is Brian Stewart, I am co-founder of Electrify Now.

Thank you Chair George and members of the commission for the opportunity to provide comment today on DEQ's 2023 climate rulemaking.

The Climate Protection Program is potentially one of the most significant tools that Oregon has to reduce climate pollution in our state and it has been designed to bring health and economic benefits to the residents of our state. But this program will only be effective if the details of the rules support the purpose of the program.

**I am very concerned that DEQ's current proposed rules would effectively undermine the purpose of the CPP and I would remind the commission that this program was adopted with overwhelming public support following an extensive stakeholder engagement process and designed to benefit the residents of Oregon.**

The proposed rules would undermine the intended objectives of the program by reducing clean energy projects built here in Oregon, meaning fewer jobs and other local economic benefits particularly for environmental justice communities across the state.

Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane or hydrogen investments and would enable the expansion of new large industrial carbon emitters.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane used for CPP compliance to that which is produced here in Oregon and provided direct benefits for Oregonians and not allow out of state RNG credits
- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system; and
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

These updates are critical to ensure that Oregon stays on track to achieve our climate goals and maximize the associated job creation, cost saving, public health, and economic development benefits here in Oregon.

Thank you for the opportunity to provide comments.

Brian Stewart

Brian Stewart  
C: 503 803 5020



**From:** [mudpuddle@everyactioncustom.com](mailto:mudpuddle@everyactioncustom.com) on behalf of [Mary Duvall](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Friday, September 15, 2023 11:17:33 AM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Mary Duvall  
73151 Lost Creek Rd Clatskanie, OR 97016-2516  
[mudpuddle@hughes.net](mailto:mudpuddle@hughes.net)

**From:** [bgreen@everyactioncustom.com](mailto:bgreen@everyactioncustom.com) on behalf of [B.Greene](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Friday, September 15, 2023 11:25:07 AM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
B. Greene  
4637 N Congress Ave Portland, OR 97217-3031  
[bgreen@flyingfocus.org](mailto:bgreen@flyingfocus.org)

**From:** [diana@everyactioncustom.com](mailto:diana@everyactioncustom.com) on behalf of [Diana Pace](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Friday, September 15, 2023 11:37:33 AM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

Now is the time to go forward and not undermine. We are all experiencing the negative effects of climate change daily.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Diana Pace  
3310 NE Douglas Ave Roseburg, OR 97470-3733  
[diana@umpquawatersheds.org](mailto:diana@umpquawatersheds.org)

**From:** [derekseverson@everyactioncustom.com](mailto:derekseverson@everyactioncustom.com) on behalf of [Derek Severson](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Friday, September 15, 2023 11:42:01 AM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18-month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits—ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Derek Severson  
928 S Ivy St Medford, OR 97501-3735  
[derekseverson@msn.com](mailto:derekseverson@msn.com)

**From:** [Sandy Small](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Friday, September 15, 2023 11:46:34 AM

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You don't often get email from [luvbensandy@foradvocacy.com](mailto:luvbensandy@foradvocacy.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Sandy Small  
18821 Baker Rd  
Bend, OR 97702

**From:** [sweetwaterhouseplants@everyactioncustom.com](mailto:sweetwaterhouseplants@everyactioncustom.com) on behalf of [Deborah Buckley](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Friday, September 15, 2023 11:55:10 AM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Deborah Buckley  
5818 NE Mason St Portland, OR 97218-2212  
[sweetwaterhouseplants@yahoo.com](mailto:sweetwaterhouseplants@yahoo.com)

**From:** [Lisa Adatto](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Comment: 2023 Climate Rulemaking  
**Date:** Friday, September 15, 2023 12:15:40 PM

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To: EQC Chair George, EQC Vice Chair Baraso, Members of the Commission, and DEQ staff  
From: Lisa Adatto, Lake Oswego Resident  
Re: DEQ's 2023 Climate Rulemaking  
Date: September 15, 2023

Good afternoon and thank you for accepting my written testimony. I have worked on climate issues for twenty years. I have been alarmed ever since my father, a University of Oregon scientist, told me about global warming, caused by fossil fuels, 50 years ago. I was one of the founders of the Lake Oswego Sustainability Network (LOSN). We promote sustainable practices in our city. Local surveys show that climate change is a top priority for our residents.

The Climate Protection Plan is a key tool that Oregonians have adopted to reduce dangerous climate pollution. Global Warming is affecting our lives: in the summer of 2023 we have experienced unbearable smoke infecting many of our most beautiful communities, we have seen precious forests burn, and around the world we watch people suffering from extreme heat, flooding, and drought. We see vacations ruined, crops fail, and people losing homes and lives. Oregon is on the right track to focus on reducing our portion of greenhouse gasses.

The strategy we are following relies on a transition away from fossil fuels to low carbon energy such as wind power, solar power, wave and geothermal power, hydropower and nuclear power. With clean electric power we electrify our heating, cooking, landscaping equipment and cars. This transition creates jobs, reduces pollution, improves health, saves money, and creates a safe future for following generations.

Unfortunately, the newest proposed draft of the CPP goes in a different direction and could lead to increased greenhouse gasses. The current rules include a loophole that would allow regulated gas utilities to rely on out-of-state biomethane investments to meet CPP requirements. This could lead to the expansion of large industrial emitters which could increase greenhouse gasses – it would undermine the whole purpose of the CPP.

I strongly urge you to amend the proposed rules by

- Restricting biomethane and hydrogen used for CPP compliance
- Strengthen emissions reduction requirements for new stationary source facilities in Oregon under the Best Available Emissions Reduction program.

I also strongly support

- Maintaining protective restrictions on biomethane accounting in the current rules
- Maintain the rule that synthetic methane derived from anthropogenic carbon sources does not comply the CPP.

All the best,

Lisa Adatto  
1960 Egan Way  
Lake Oswego, Or.



**From:** [jsklof@everyactioncustom.com](mailto:jsklof@everyactioncustom.com) on behalf of [S. Klof](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Friday, September 15, 2023 1:22:11 PM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
S Klof  
766 Charles Ave S Salem, OR 97302-6005  
[jsklof@yahoo.com](mailto:jsklof@yahoo.com)

**From:** [cjp8784@everyactioncustom.com](mailto:cjp8784@everyactioncustom.com) on behalf of [Connie Peterson](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Friday, September 15, 2023 2:05:21 PM

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Dear Oregon Department of Environmental Quality,

As a third generation Oregonian, I appreciate the opportunity to provide comment on DEQ's 2023 climate rulemaking. I am encouraged by the mere existence of the Climate Protection Program (CPP) and understand that it is vital to achieving our state's climate pollution reduction goals. I share the in the overwhelming public support generated by an extensive 18 month rulemaking and stakeholder engagement process.

I am profoundly disappointed that the DEQ's current proposed rules would effectively undermine the CPP--allowing regulated gas utilities to rely on out-of-state biomethane investments, and permitting the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will weaken the program's intended public health, economic, and employment goals, and undercut benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ has to comprehend, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, if done as was expected, will be absolutely vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits-- ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Connie Peterson  
2203 NW Clearwater Dr Bend, OR 97703-7339  
[cjp8784@gmail.com](mailto:cjp8784@gmail.com)

**From:** [Quentin, Peggy](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Friday, September 15, 2023 2:35:26 PM

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You don't often get email from [peggy.quentin@redcross.org](mailto:peggy.quentin@redcross.org). [Learn why this is important](#)

Dear Sir/Miss:

The Oregon Department of Environmental Quality (DEQ) must ensure the Climate Protection Program stays on track to achieve its climate goals and deliver public health, economic, and job benefits for Oregon communities. Specifically, it is vital that the DEQ strengthen its current proposed rules by:

1. Restricting biomethane (aka renewable natural gas (RNG)) and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians.
2. Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction (BAER) program.

**As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.**

3. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.
4. I am concerned that DEQ's current proposed rules would effectively undermine the CPP— a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.
5. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon.
6. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.
7. I strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from anthropogenic carbon sources does *not* comply with the CPP.
8. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits— ensuring that they benefit Oregon communities, and are not exported

out of state.

Thank you for your attention and for accepting comments.

Margaret Quentin

**From:** [Rick Ray](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Friday, September 15, 2023 2:57:03 PM

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You don't often get email from rick@rickray.com. [Learn why this is important](#)

Please ensure the Climate Protection Program stays on track to achieve its climate goals and deliver public health, economic, and job benefits for Oregon communities. Specifically, it is vital that the DEQ strengthen its [current proposed rules](#) by:

1. Restricting biomethane (aka renewable natural gas (RNG)) and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians.
2. Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction (BAER) program.

Thank you!

Rick Ray

=====  
*Rick Ray*  
*Troutdale, OR 97060*

**From:** [Chris Swires](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Public Comment  
**Date:** Friday, September 15, 2023 3:38:33 PM  
**Attachments:** [tyreeoil linkedin 18.png](#)  
[tyreeoil faceboo 20.png](#)  
[tyreeoil instagram 20.png](#)  
[tyreeoil twitter 20.png](#)  
[tyreeoil allAboutUptime 107.png](#)  
[Public Comment on Proposed Rules Office of Greenhouse Gas Programs Climate 2023 Rulemaking.docx](#)

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You don't often get email from [chris.swires@tyreeoil.com](mailto:chris.swires@tyreeoil.com). [Learn why this is important](#)

Attached please find our public comment for your proposed rulemaking.

Thank you,

**Chris Swires**  
Tax and Compliance Specialist

---

o: (541) 687-0076 x1112  
d: (541) 687-0076  
e: [chris.swires@tyreeoil.com](mailto:chris.swires@tyreeoil.com)  
w: [tyreeoil.com](http://tyreeoil.com)  
a: [2076 Irving Rd // Eugene, OR // 97402](#)



**ALL  
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**From:** [linda.perrine](mailto:linda.perrine@gmail.com)  
**To:** [TRAPP Lindsay \\* DEQ](#)  
**Subject:** Public Comment - Climate Protection Program  
**Date:** Friday, September 15, 2023 4:04:06 PM

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## DEQ Rulemaking Comments

My name is Linda Perrine a volunteer with Electrify Oregon, a group working to educate Oregonians on home electrification and IRA incentives and rebates.

Thank you Chair George and members of the commission and staff for the opportunity to provide comment on DEQ's 2023 climate rulemaking.

The Climate Protection Program is potentially one of the most significant tools that Oregon has to reduce climate pollution in our state and it has been designed to bring health and economic benefits to the residents of our state. But this program will only be effective if the details of the rules support the purpose of the program.

I am very concerned that DEQ's current proposed rules would effectively undermine the purpose of the CPP and I would remind the commission that this program was adopted with overwhelming public support following an extensive stakeholder engagement process and was designed to benefit the residents of Oregon.

The proposed rules would undermine the intended objectives of the program by reducing clean energy projects built here in Oregon, meaning fewer jobs and other local economic benefits particularly for environmental justice communities across the state.

Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane or hydrogen investments and would enable the expansion of new large industrial carbon emitters.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane used for CPP compliance to that which is produced here in Oregon and provided direct benefits for Oregonians and not allow out of state RNG credits.
- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system.
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

These updates are critical to ensure that Oregon stays on track to achieve our climate goals and to maximize the associated job creation, cost saving, public health, and economic development benefits here in Oregon.

Thank you for the opportunity to provide comments.

Linda Perrine  
Lincoln City, OR

**From:** [Cathy Duc](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Friday, September 15, 2023 4:43:22 PM

---

You don't often get email from [cruisingnapt@grassrootsmessage.com](mailto:cruisingnapt@grassrootsmessage.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Cathy Duc  
20149 NE Oregon St  
Fairview, OR 97024

**From:** [Emy Syrop](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Friday, September 15, 2023 4:43:28 PM

---

You don't often get email from emysyrop@grassrootsmessage.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Emy Syrop  
235 NW 55th St  
Newport, OR 97365

**From:** [E. Darby](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Friday, September 15, 2023 4:43:31 PM

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You don't often get email from elizabethdarby137@gmail.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

However, I was disappointed to hear that the recent rule-making table did not include community input, and also that the results lacked in meeting the plan's original goals of reducing greenhouse gas emissions by 50%, providing meaningful investments to benefit Oregonians, and holding big polluters accountable.

Therefore, I am calling on the DEQ to adapt the rules for CPP implementation to focus on the original goals of:

- 1) Reducing greenhouse gas emissions and other air pollutants, maximizing public health benefits, and minimizing costs for consumers in environmental justice and other communities in Oregon.
- 2) Keeping economic and health benefits of the Community Climate Investment program in Oregon: investments should materially benefit Oregonians at the frontlines of pollution and the climate crisis, rather than paying for cheap offsets in other places.
- 3) Achieving real reduction of emissions by 50%, rather than allowing companies to invest in biomass-derived fuels such as "renewable natural gas" (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
- 4) Holding big polluters accountable to engage in science-based "best available emissions reductions" (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.
- 5) Returning the date for a "new source" of stationary pollution to December 31, 2021.

The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
E. Darby  
1020 NW 9th Ave  
Portland, OR 97209

**From:** [MARY PETERSON](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Friday, September 15, 2023 4:43:35 PM

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You don't often get email from mary.peterso@gmail.com. [Learn why this is important](#)

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Thank you for considering these comments and recommendations.

Sincerely,  
MARY PETERSON  
351 SE Back Bay Dr  
Newport, OR 97365

**From:** [Carolyn Latierra](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Friday, September 15, 2023 4:43:39 PM

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You don't often get email from a.biophilic@gmail.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

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Thank you for considering these comments and recommendations.

Sincerely,  
Carolyn Latierra  
3223 NE Knott St  
Portland, OR 97212

**From:** [Lisa Caine](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Friday, September 15, 2023 4:43:42 PM

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You don't often get email from [lcaine530@gmail.com](mailto:lcaine530@gmail.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

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Thank you for considering these comments and recommendations.

Sincerely,  
Lisa Caine  
2014 ne brazee  
Portland, OR 97212

**From:** [Susan Evans](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Friday, September 15, 2023 4:43:49 PM

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You don't often get email from susanwenatchee@gmail.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

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The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Please focus on reducing emissions. This is critical at this time. Thank you!

Sincerely,  
Susan Evans  
7640 SE Taylor St  
Portland, OR 97215

**From:** [Sascha Krader](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Friday, September 15, 2023 4:43:56 PM

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You don't often get email from [sascha.krader@gmail.com](mailto:sascha.krader@gmail.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

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The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
Sascha Krader  
2825 NE 29th Ave  
Portland, OR 97212

**From:** [Jane Comeault](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Friday, September 15, 2023 4:44:01 PM

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You don't often get email from janevthomson@hotmail.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

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Thank you for considering these comments and recommendations.

Sincerely,  
Jane Comeault  
2905 NE Schuyler St  
Portland, OR 97212

**From:** [Janet Kirkland](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Friday, September 15, 2023 4:44:07 PM

---

You don't often get email from janetkirkland00@gmail.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

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Thank you for considering these comments and recommendations.

Sincerely,  
Janet Kirkland  
4050 sw Bancroft  
Portland, OR 97221

**From:** [Brian Romer](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Friday, September 15, 2023 4:44:11 PM

---

You don't often get email from [briansromer@gmail.com](mailto:briansromer@gmail.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

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Thank you for considering these comments and recommendations.

Sincerely,  
Brian Romer  
2825 SE 67th Ave  
Portland, OR 97206

**From:** [Cherine Bauer](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Friday, September 15, 2023 4:44:13 PM

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You don't often get email from cherinel@comcast.net. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

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Thank you for considering these comments and recommendations.

Sincerely,  
Cherine Bauer  
85 River Loop 1  
Eugene, OR 97404

**From:** [Sarah Clark](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Friday, September 15, 2023 4:44:18 PM

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You don't often get email from sarahc.acupuncture@gmail.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

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Therefore, I am calling on the DEQ to adapt the rules for CPP implementation to focus on the original goals of:

- 1) Reducing greenhouse gas emissions and other air pollutants, maximizing public health benefits, and minimizing costs for consumers in environmental justice and other communities in Oregon.
- 2) Keeping economic and health benefits of the Community Climate Investment program in Oregon: investments should materially benefit Oregonians at the frontlines of pollution and the climate crisis, rather than paying for cheap offsets in other places.
- 3) Achieving real reduction of emissions by 50%, rather than allowing companies to invest in biomass-derived fuels such as "renewable natural gas" (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
- 4) Holding big polluters accountable to engage in science-based "best available emissions reductions" (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.
- 5) Returning the date for a "new source" of stationary pollution to December 31, 2021.

The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
Sarah Clark  
8945 NE Everett St  
Portland, OR 97220

**From:** [Jynx Houston](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Friday, September 15, 2023 4:44:22 PM

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Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

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- 1) Reducing greenhouse gas emissions and other air pollutants, maximizing public health benefits, and minimizing costs for consumers in environmental justice and other communities in Oregon.
- 2) Keeping economic and health benefits of the Community Climate Investment program in Oregon: investments should materially benefit Oregonians at the frontlines of pollution and the climate crisis, rather than paying for cheap offsets in other places.
- 3) Achieving real reduction of emissions by 50%, rather than allowing companies to invest in biomass-derived fuels such as "renewable natural gas" (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
- 4) Holding big polluters accountable to engage in science-based "best available emissions reductions" (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.
- 5) Returning the date for a "new source" of stationary pollution to December 31, 2021.

The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
Jynx Houston  
7605 SE Lincoln St  
Portland, OR 97215

**From:** [Brent Rocks](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Friday, September 15, 2023 4:44:26 PM

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Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

However, I was disappointed to hear that the recent rule-making table did not include community input, and also that the results lacked in meeting the plan's original goals of reducing greenhouse gas emissions by 50%, providing meaningful investments to benefit Oregonians, and holding big polluters accountable.

Therefore, I am calling on the DEQ to adapt the rules for CPP implementation to focus on the original goals of:

- 1) Reducing greenhouse gas emissions and other air pollutants, maximizing public health benefits, and minimizing costs for consumers in environmental justice and other communities in Oregon.
- 2) Keeping economic and health benefits of the Community Climate Investment program in Oregon: investments should materially benefit Oregonians at the frontlines of pollution and the climate crisis, rather than paying for cheap offsets in other places.
- 3) Achieving real reduction of emissions by 50%, rather than allowing companies to invest in biomass-derived fuels such as "renewable natural gas" (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
- 4) Holding big polluters accountable to engage in science-based "best available emissions reductions" (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.
- 5) Returning the date for a "new source" of stationary pollution to December 31, 2021.

The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Oregon

Sincerely,  
Brent Rocks  
1518 SW Upper Hall St  
Portland, OR 97201

**From:** [Valerie Snyder](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Friday, September 15, 2023 4:45:30 PM

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You don't often get email from [mvensnyder@yahoo.com](mailto:mvensnyder@yahoo.com). [Learn why this is important](#)

Dear Commissioners,

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that the Department of Environmental Quality (DEQ)'s draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. For the CPP to deliver, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. Hydrogen is a leak-prone gas, and the risks of hydrogen leakage must be incorporated into our decision-making.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Best Available Emissions Reduction (BAER) assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Thank you for your consideration,

Sincerely,  
Valerie Snyder  
3311 Valley Crest Way  
Forest Grove, OR 97116

**From:** [infomavn@everyactioncustom.com](mailto:infomavn@everyactioncustom.com) on behalf of [Melissa Hathaway](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Friday, September 15, 2023 5:15:59 PM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Melissa Hathaway  
601 NE 162nd Ave Portland, OR 97230-5751  
[infomavn@teleport.com](mailto:infomavn@teleport.com)

**From:** [Bob.MaryHughes@everyactioncustom.com](mailto:Bob.MaryHughes@everyactioncustom.com) on behalf of [Mary Hughes](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Friday, September 15, 2023 5:29:42 PM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

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I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Mary Hughes  
2895 SE Glenn St Corvallis, OR 97333-2169  
[Bob.MaryHughes@comcast.net](mailto:Bob.MaryHughes@comcast.net)

**From:** [Sylvia Jung](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Friday, September 15, 2023 5:39:40 PM

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You don't often get email from [sylvia\\_jung@p2a.co](mailto:sylvia_jung@p2a.co). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Sylvia Jung  
4011 SE 27th Ave  
Portland, OR 97202

**From:** [Kharma lockett](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Friday, September 15, 2023 7:09:57 PM

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Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Kharma lockett  
450 NE Jessup St  
Portland, OR 97211

**From:** [Josh Mooney](#)  
**To:** [TRAPP Lindsay \\* DEQ](#)  
**Subject:** DEQ Climate Rulemaking Comment  
**Date:** Friday, September 15, 2023 8:01:42 PM

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You don't often get email from [josh.mooney@gmail.com](mailto:josh.mooney@gmail.com). [Learn why this is important](#)

To whom it may concern,

My name is Josh Mooney from Energize Bend, a grass roots group focused on home electrification.

Thank you Chair George and members of the commission and staff for the opportunity to provide comment on DEQ's 2023 climate rulemaking.

The Climate Protection Program is potentially one of the most significant tools that Oregon has to reduce climate pollution in our state and it has been designed to bring health and economic benefits to the residents of our state. But this program will only be effective if the details of the rules support the purpose of the program.

I am very concerned that DEQ's current proposed rules would effectively undermine the purpose of the CPP and I would remind the commission that this program was adopted with overwhelming public support following an extensive stakeholder engagement process and was designed to benefit the residents of Oregon.

The proposed rules would undermine the intended objectives of the program by reducing clean energy projects built here in Oregon, meaning fewer jobs and other local economic benefits particularly for environmental justice communities across the state.

Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane or hydrogen investments and would enable the expansion of new large industrial carbon emitters.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane used for CPP compliance to that which is produced here in Oregon and provided direct benefits for Oregonians and not allow out of state RNG credits.
- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system.
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

These updates are critical to ensure that Oregon stays on track to achieve our climate goals and to maximize the associated job creation, cost saving, public health, and economic development benefits here in Oregon.

Thank you for the opportunity to provide comments.

Josh

**From:** [carterwstcvn@everyactioncustom.com](mailto:carterwstcvn@everyactioncustom.com) on behalf of [Marian Carter](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Friday, September 15, 2023 8:37:06 PM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Marian Carter  
501 Tuckaway Dr Elkton, OR 97436-9630  
[carterwstcvn@aol.com](mailto:carterwstcvn@aol.com)

**From:** [louisa@everyactioncustom.com](mailto:louisa@everyactioncustom.com) on behalf of [Louisa Shelby](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Friday, September 15, 2023 8:42:37 PM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Louisa Shelby  
865 NW Raintree Dr Corvallis, OR 97330-9768  
[louisa@peak.org](mailto:louisa@peak.org)

**From:** [Kathy Moore](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Friday, September 15, 2023 10:25:55 PM

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Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Kathy Moore  
2403 Wayside Terrace NE  
Salem, OR 97301

**From:** [charclick1@everyactioncustom.com](mailto:charclick1@everyactioncustom.com) on behalf of [Charlotte Campbell](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Friday, September 15, 2023 10:50:55 PM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Charlotte Campbell  
3425 NW Pineview Pl Albany, OR 97321-9659  
[charclick1@yahoo.com](mailto:charclick1@yahoo.com)

**From:** [Jan Nichols](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Saturday, September 16, 2023 1:23:06 AM

---

You don't often get email from jannichols44@sendgrassroots.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Jan Nichols  
Portland, OR 97201

**From:** [nnatlee@everyactioncustom.com](mailto:nnatlee@everyactioncustom.com) on behalf of [Dianna Pounder](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Saturday, September 16, 2023 6:59:12 AM

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Thank you.

Sincerely,  
Dianna Pounder  
292 E Anchor Ave Eugene, OR 97404-5938  
[nnatlee@gmail.com](mailto:nnatlee@gmail.com)

**From:** [bkimble@everyactioncustom.com](mailto:bkimble@everyactioncustom.com) on behalf of [Bret Kimple](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Saturday, September 16, 2023 7:29:30 AM

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Dear Oregon Department of Environmental Quality,

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Thank you.

Sincerely,  
Bret Kimple  
19845 Porcupine Dr Bend, OR 97702-2095  
[bkimble@gmail.com](mailto:bkimble@gmail.com)

**From:** [melloves2run@everyactioncustom.com](mailto:melloves2run@everyactioncustom.com) on behalf of [Melanie Kimple](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Saturday, September 16, 2023 7:30:10 AM

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Dear Oregon Department of Environmental Quality,

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Thank you.

Sincerely,  
Melanie Kimple  
19845 Porcupine Dr Bend, OR 97702-2095  
[melloves2run@msn.com](mailto:melloves2run@msn.com)

**From:** [Peter Kokopeli](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Saturday, September 16, 2023 8:16:41 AM

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You don't often get email from [hobbes@shoutandsing.com](mailto:hobbes@shoutandsing.com). [Learn why this is important](#)

I am writing to comment on DEQ's 2023 climate rulemaking.

DEQ should amend the proposed rules by:

- 1) Restricting biomethane used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane that is injected into a pipeline within Oregon;
- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system; and
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

In the current rules DEQ should maintain protective restrictions on biomethane accounting including synthetic methane derived from anthropogenic carbon sources that does not comply with the CPP.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits—ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you,

Peter Kokopeli  
6677 SE Yamhill St  
Portland, OR 97215

**From:** [Janet Frisella](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Saturday, September 16, 2023 8:29:45 AM

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You don't often get email from [viblai@forgrassroots.com](mailto:viblai@forgrassroots.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Janet Frisella  
150 Ragan Rd  
Williams, OR 97544

**From:** [Virginia Jordan](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Saturday, September 16, 2023 8:57:31 AM

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Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Virginia Jordan  
1101 31st Ave SE  
Albany, OR 97322

**From:** [robbinschindele@everyactioncustom.com](mailto:robbinschindele@everyactioncustom.com) on behalf of [Robbin Schindele](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Saturday, September 16, 2023 9:21:32 AM

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Thank you.

Sincerely,  
Robbin Schindele  
PO Box 342 Glide, OR 97443-0342  
[robbinschindele@yahoo.com](mailto:robbinschindele@yahoo.com)

**From:** [Patty Kincaid](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Saturday, September 16, 2023 9:25:06 AM

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I am afraid current deq rules may undermine the CPP.  
Will you please update the rules to accommodate the CPP, which was developed with public support and stakeholder engagement in a more-than-a-year process.

Patricia M Kincaid  
456 W 21st Ave  
Eugene, OR 97405  
541-345-5000

**From:** [lgsvenson@everyactioncustom.com](mailto:lgsvenson@everyactioncustom.com) on behalf of [Laurie Swenson](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Saturday, September 16, 2023 10:18:48 AM

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Thank you.

Sincerely,  
Laurie Swenson  
1136 SW Ellenhurst Pl Bend, OR 97702-1153  
[lgsvenson@yahoo.com](mailto:lgsvenson@yahoo.com)

**From:** [hemming@everyactioncustom.com](mailto:hemming@everyactioncustom.com) on behalf of [James Hemmingsen](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Saturday, September 16, 2023 10:19:42 AM

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Sincerely,  
James Hemmingsen  
1860 Riverview St Eugene, OR 97403-2115  
[hemming@cyber-dyne.com](mailto:hemming@cyber-dyne.com)

**From:** [sofia buschman](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Saturday, September 16, 2023 10:20:34 AM

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You don't often get email from [buschmansofie@advocatefor.me](mailto:buschmansofie@advocatefor.me). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
sofia buschman  
2112 NW Woodland Dr  
Corvallis, OR 97330

**From:** [mgmabbitt@everyactioncustom.com](mailto:mgmabbitt@everyactioncustom.com) on behalf of [Marianne Mabbitt](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Saturday, September 16, 2023 12:11:24 PM

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Dear Oregon Department of Environmental Quality,

The EARTH IS BURNING WHILE LEGISLATORS FIDDLE!!

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Marianne Mabbitt  
2195 Western Heights Loop NW Salem, OR 97304-4819  
[mgmabbitt@gmail.com](mailto:mgmabbitt@gmail.com)

**From:** [Laura Alexander](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Saturday, September 16, 2023 1:58:51 PM

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You don't often get email from lcalex@umich.edu. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

However, I was disappointed to hear that the recent rule-making table did not include community input, and also that the results lacked in meeting the plan's original goals of reducing greenhouse gas emissions by 50%, providing meaningful investments to benefit Oregonians, and holding big polluters accountable.

Therefore, I am calling on the DEQ to adapt the rules for CPP implementation to focus on the original goals of:

- 1) Reducing greenhouse gas emissions and other air pollutants, maximizing public health benefits, and minimizing costs for consumers in environmental justice and other communities in Oregon.
- 2) Keeping economic and health benefits of the Community Climate Investment program in Oregon: investments should materially benefit Oregonians at the frontlines of pollution and the climate crisis, rather than paying for cheap offsets in other places.
- 3) Achieving real reduction of emissions by 50%, rather than allowing companies to invest in biomass-derived fuels such as "renewable natural gas" (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
- 4) Holding big polluters accountable to engage in science-based "best available emissions reductions" (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.
- 5) Returning the date for a "new source" of stationary pollution to December 31, 2021.

The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Please continue to prioritize communities of color and other vulnerable groups in working to protect Oregon from the impacts of climate change!

Thank you!!

Sincerely,  
Laura Alexander  
Portland  
Portland, OR 97212

**From:** [Janet Koch](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Saturday, September 16, 2023 2:34:43 PM

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You don't often get email from janetkoch49@yourconstituent.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Janet Koch  
4723 Royal Dr NE  
Albany, OR 97321

**From:** [mrdanaweintraub@everyactioncustom.com](mailto:mrdanaweintraub@everyactioncustom.com) on behalf of [Dana Weintraub](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Saturday, September 16, 2023 2:45:52 PM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Dana Weintraub  
17124 SW Marty Ln Beaverton, OR 97003-4249  
[mrdanaweintraub@tutanota.com](mailto:mrdanaweintraub@tutanota.com)

**From:** [Jo Alcazar](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Saturday, September 16, 2023 3:22:19 PM

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You don't often get email from joannpaasch1946@yourconstituent.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

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most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Jo Alcazar  
970 W Juniper Ave  
Hermiston, OR 97838

**From:** [Donna Corum](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Saturday, September 16, 2023 3:53:33 PM

---

You don't often get email from hillbillydreamz@sendgrassroots.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

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Regards,  
Donna Corum  
PO Box 121  
Myrtle Point, OR 97458

**From:** [Kelly DiCicco](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Saturday, September 16, 2023 4:06:36 PM

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You don't often get email from [diccok@grsdelivery.com](mailto:diccok@grsdelivery.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

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Regards,  
Kelly DiCicco  
18345 NE Glisan St Unit 8  
Portland, OR 97230

**From:** [Kristin Guest](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Saturday, September 16, 2023 4:22:58 PM

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You don't often get email from [kguest@seattleu.edu](mailto:kguest@seattleu.edu). [Learn why this is important](#)

Dear Members of the Climate Rulemaking Group:

I am emailing as a senior citizen living in a retirement community in Portland who works actively with "green teams" in other retirement communities to try to address the climate crisis for the sake of generations to come. I believe that we all have an obligation to try to leave a livable planet for our children and grandchildren, and that will only happen by taking significant steps NOW.

I am concerned that Oregon's important Climate Protection Program could be weakened by the draft rules that the DEQ has proposed. It is imperative that Oregon do everything it can to reduce carbon emissions and provide benefits to local communities.

**Please adopt rules that maximize benefits to Oregonians.**

Kristin Guest  
Portland Oregon

**From:** [Linda S Craig](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rule Making  
**Date:** Saturday, September 16, 2023 5:01:11 PM  
**Attachments:** [CPP 9 16 2023.pdf](#)

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You don't often get email from lindacraigpdx@gmail.com. [Learn why this is important](#)

**To Environmental Quality Commission and Department of Environmental Quality:**

**From:** [Janice Christoffersen](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Saturday, September 16, 2023 5:09:07 PM

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You don't often get email from [janice.christoffersen@advocatefor.me](mailto:janice.christoffersen@advocatefor.me). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Janice Christoffersen  
11090 SE 77th Ave  
Milwaukie, OR 97222

**From:** [Rachel Osmundsen](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Saturday, September 16, 2023 5:14:45 PM

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You don't often get email from rachel.osmundsen@gmail.com. [Learn why this is important](#)

Hello,

I am very excited about the Climate Protection Program (CPP), and want Oregon to take big bold action on climate change. To do this, the DEQ needs to strengthen the rules for the CPP. We have a crucial chance to affect Oregon's 30-year plan to reduce carbon emissions.

With the current draft rules, I am most concerned about fossil fuel suppliers being able to buy Community Climate Investment (CCI) credits as a way to meet the greenhouse gas emission cap. Fossil fuel suppliers need to ACTUALLY reduce their emissions by 90% by 2050, not just pay for "renewable" natural gas and hydrogen that still emit fossil fuels. Furthermore, I am concerned about companies being able to buy CCI credits out of state, and continue to burn fossil fuels in the state. Oregonians want clean air in their own communities, and want to receive renewable energy directly, not through an offset program. Out-of-state CCI projects do not create jobs in Oregon. Out-of-state investments allow fossil-fuel suppliers to continue to expand fossil fuel infrastructure in Oregon, which is counter to the values of the majority of Oregonians who want a clean energy future right here in our state.

Thank you for your work on this issue. Please keep the economic, health, and safety benefits of a clean energy transition for Oregonians front-of-mind as you move forward in the rule-making process. We need to hold fossil fuel suppliers responsible and create a real reduction of emissions in Oregon.

Thank you,  
Rachel Osmundsen

**From:** [KATHALEEN PARKER](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Saturday, September 16, 2023 7:34:09 PM

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You don't often get email from parker.kathaleen@p2a.co. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
KATHALEEN PARKER  
4462 Kurth St S  
Salem, OR 97302

**From:** [veenaschnitzel@everyactioncustom.com](mailto:veenaschnitzel@everyactioncustom.com) on behalf of [Veena Singwi](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Saturday, September 16, 2023 7:51:36 PM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Veena Singwi  
327 Argon Ave Eugene, OR 97404-1081  
[veenaschnitzel@yahoo.com](mailto:veenaschnitzel@yahoo.com)

**From:** [bizzy\\_gross@everyactioncustom.com](mailto:bizzy_gross@everyactioncustom.com) on behalf of [Elisabeth Gross](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Saturday, September 16, 2023 8:13:35 PM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Elisabeth Gross  
54999 Mallard Dr Bend, OR 97707-2409  
[bizzy\\_gross@yahoo.com](mailto:bizzy_gross@yahoo.com)

**From:** [Janice Christoffersen](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Saturday, September 16, 2023 10:28:29 PM

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You don't often get email from [janice.christoffersen@grsdelivery.com](mailto:janice.christoffersen@grsdelivery.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Janice Christoffersen  
11090 SE 77th Ave  
Milwaukie, OR 97222

**From:** [pcbrandom@everyactioncustom.com](mailto:pcbrandom@everyactioncustom.com) on behalf of [Peter Brandom](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Sunday, September 17, 2023 7:48:21 AM

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Dear Oregon Department of Environmental Quality,

Dear Commissioners, I was a member of the committee that established the Climate Protection Program. It represents the most impactful work that I've been involved with, professionally or personally. The rulemaking process was strong, and the input incorporated into the rules. Most importantly, the DEQ demonstrated without doubt that this program, under the adopted rule, will effectively address emissions from one of the largest contributing sectors.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, while maximizing the associated job creation, cost saving, public health, and economic development benefits.

Change is difficult, and some industries will necessarily have to change under the rule. But I think any doubt of the urgency to reduce GHG emissions has now vanished. It is the greatest problem to ever face Earth and humans.

Thank you.

Sincerely,  
Peter Brandom  
1169 SE 40th Ave Hillsboro, OR 97123-7504  
[pcbrandom@gmail.com](mailto:pcbrandom@gmail.com)

**From:** [Laura Guerrero](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Sunday, September 17, 2023 8:30:04 AM

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You don't often get email from hlebk5@forgrassroots.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Laura Guerrero  
1317 NE 10th St  
Grants Pass, OR 97526

**From:** [Mel rose](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Sunday, September 17, 2023 11:39:55 AM

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You don't often get email from melr4957@foradvocacy.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Mel rose  
216 NW Linster Pl  
Bend, OR 97703

**From:** [Benton Elliott](#)  
**To:** [2023 Climate - DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Sunday, September 17, 2023 11:44:22 AM

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Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by restricting biomethane or hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Thank you for considering my input and for doing the right thing.

Benton Elliott, Eugene

**From:** [Roman weis](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Sunday, September 17, 2023 12:16:55 PM

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Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

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most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Roman weis  
Salem, OR 97308

**From:** [rennor@everyactioncustom.com](mailto:rennor@everyactioncustom.com) on behalf of [Norah Renken](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Sunday, September 17, 2023 12:37:39 PM

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[You don't often get email from [rennor@everyactioncustom.com](mailto:rennor@everyactioncustom.com). Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Norah Renken  
5603 N Syracuse St Portland, OR 97203-5241  
[rennor@gmail.com](mailto:rennor@gmail.com)

**From:** [Tom Peck](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Comment letter to DEQ RE: Environmental Quality Commission & the imbalance of the Rulemaking Advisory Committee  
**Date:** Sunday, September 17, 2023 12:56:27 PM  
**Attachments:** [Comment letter to DEQ 9.17.2023.docx](#)

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September 17, 2023

Department of Environmental Quality,

Dear DEQ Board,

I am a resident of Eugene Oregon and am extremely concerned that human activity of over producing CO2 and other Greenhouse gas emissions into the atmosphere is causing our planet to over heat.

I am also extremely concerned at the direction the DEQ is taking. The Climate Protection Program that was approved last year by the (EQC) is under threat by the inappropriate imbalance of the utility company representation on the Rulemaking Advisory Committee. As you know, of the 14 members, 12 are representing the utilities companies. This will produce outcomes that will bypass the Community Climate Investment fund and will not create a downward trajectory of greenhouse gas emissions. We encourage the position that only hydrogen produced through electrolysis using renewable energy should be acceptable.

We need to take dramatic action to curb the climate emergency that we are clearly facing. I strongly urge the DEQ to maintain the original Climate Protection Program that was approved last year by the Environmental Quality Commission (EQC).

Sincerely,

Tom Peck  
2180 Friendly St.  
Eugene, OR 97405

**From:** [djripke1@everyactioncustom.com](mailto:djripke1@everyactioncustom.com) on behalf of [Donna Sharp](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Sunday, September 17, 2023 2:09:47 PM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Donna Sharp  
26110 Bud Ln Veneta, OR 97487-9688  
[djripke1@aol.com](mailto:djripke1@aol.com)

**From:** [susapple54@everyactioncustom.com](mailto:susapple54@everyactioncustom.com) on behalf of [Susan Applegate](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Sunday, September 17, 2023 4:16:28 PM

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Dear Oregon Department of Environmental Quality,

I have been so proud of Oregon for promoting and adopting a Climate Protection Program. Now, thank you for the opportunity to provide comment on DEQ's 2023 climate rule-making. This is the critical part -- rule-making. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support. The public was involved over the 18 month process.

Now I have been alerted that the DEQ's current proposed rules would effectively undermine the CPP. Most specifically, it concerns me that the DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, enabling the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon.

This proposal undermines the entire purpose of the CPP. It would be as though it had not been crafted with such hope and community involvement. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rule-making will have far-reaching consequences for the climate, and communities in Oregon. As a citizen of Oregon and the World, I really don't care if companies can't do business as usual in Oregon. Times have changed. The drought is killing us. All companies who want to do business in Oregon within the energy sector, should know they must abide by the regulations of Oregon's cornerstone CPP. The rule-making is critical and if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits-- ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Susan Applegate  
4739 Elkhead Rd Yoncalla, OR 97499-8702  
[susapple54@gmail.com](mailto:susapple54@gmail.com)

**From:** [mvensnyder@everyactioncustom.com](mailto:mvensnyder@everyactioncustom.com) on behalf of [Valerie Snyder](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Sunday, September 17, 2023 5:17:44 PM

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[You don't often get email from [mvensnyder@everyactioncustom.com](mailto:mvensnyder@everyactioncustom.com). Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Valerie Snyder  
3311 Valley Crest Way Forest Grove, OR 97116-1025  
[mvensnyder@yahoo.com](mailto:mvensnyder@yahoo.com)

**From:** [hojoharrison@everyactioncustom.com](mailto:hojoharrison@everyactioncustom.com) on behalf of [Howard Harrison](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Sunday, September 17, 2023 5:32:28 PM

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[You don't often get email from [hojoharrison@everyactioncustom.com](mailto:hojoharrison@everyactioncustom.com). Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

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Thank you.

Sincerely,  
Howard Harrison  
604 Ash Ave Tillamook, OR 97141-3663  
[hojoharrison@gmail.com](mailto:hojoharrison@gmail.com)

**From:** [hojoharrison@everyactioncustom.com](mailto:hojoharrison@everyactioncustom.com) on behalf of [Joy Harrison](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Sunday, September 17, 2023 5:33:09 PM

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Thank you.

Sincerely,  
Joy Harrison  
604 Ash Ave Tillamook, OR 97141-3663  
[hojoharrison@gmail.com](mailto:hojoharrison@gmail.com)

**From:** [awizard@everyactioncustom.com](mailto:awizard@everyactioncustom.com) on behalf of [Rich Rodriguez](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Sunday, September 17, 2023 7:23:50 PM

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[You don't often get email from [awizard@everyactioncustom.com](mailto:awizard@everyactioncustom.com). Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

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Thank you.

Sincerely,  
Rich Rodriguez  
5136 Bailey Ct NE Keizer, OR 97303-4600  
[awizard@aol.com](mailto:awizard@aol.com)

**From:** [Brice Suprenant](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Sunday, September 17, 2023 9:38:38 PM

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You don't often get email from bsuprena@gmail.com. [Learn why this is important](#)

To whom it may concern,

As a citizen of Oregon I am writing to you about my concern for the new CPP rules being proposed by the DEQ as it is missing key climate justice elements. The CPP must continue to focus on the original goals of reducing greenhouse gas emissions, maximizing public health benefits, and minimizing costs for consumers. Investments should materially benefit Oregonians. We must reduce our emissions and not "offset" them which really isn't a thing to begin with. You also need to hold the big polluters accountable and continue to reduce our carbon footprint.

Thank you

**From:** [dylanhinson@everyactioncustom.com](mailto:dylanhinson@everyactioncustom.com) on behalf of [Dylan Hinson](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** Climate Protection Plan Rule making  
**Date:** Sunday, September 17, 2023 9:43:15 PM

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[You don't often get email from [dylanhinson@everyactioncustom.com](mailto:dylanhinson@everyactioncustom.com). Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Oregon Department of Environmental Quality,

Groups across Oregon have worked together extensively to draft the current rules for the climate protection program. These rules have balanced business interests with our community well being to best serve our state.

The Department of Environmental Quality's current proposed rules would allow increased industrial pollution in Oregon and weaken our climate protections by allowing for out of state import of biomethane. As a bioengineer, I understand fully that there is a place for biomethane in our energy sector, but importing it from out of state is illogical and reckless. This move would endanger the health of front line communities and make us miss our climate goals. It also would further damage the health and climate of communities outside of Oregon.

I ask that the DEQ amends its proposed rules to exclude the purchase of biomethane from out of state, protecting our local business, environment and health.

Thank you.

Sincerely,  
Dylan Hinson  
7117 N John Ave Unit 1 Portland, OR 97203-4889  
[dylanhinson@gmail.com](mailto:dylanhinson@gmail.com)

**From:** [Dave King](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Sunday, September 17, 2023 10:09:41 PM

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You don't often get email from [davewaveking@p2a.co](mailto:davewaveking@p2a.co). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

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**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Dave King  
8716 N Edison St  
Portland, OR 97203

**From:** [Lisa Wolf](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 18, 2023 4:18:04 AM

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You don't often get email from lisawolf1435@sendgrassroots.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

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Regards,  
Lisa Wolf  
32620 Deberry Rd  
Creswell, OR 97426

**From:** [Sheila L](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 18, 2023 6:34:41 AM

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Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Sheila L  
Portland, OR 97217

**From:** [ingridlustig22@everyactioncustom.com](mailto:ingridlustig22@everyactioncustom.com) on behalf of [Ingrid Lustig](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Monday, September 18, 2023 7:00:47 AM

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Thank you.

Sincerely,  
Ingrid Lustig  
61192 Loy Ln Bend, OR 97702-2618  
[ingridlustig22@gmail.com](mailto:ingridlustig22@gmail.com)

**From:** [Ashley Snyder](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 18, 2023 8:30:40 AM

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You don't often get email from fitmommy2134@sendgrassroots.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Ashley Snyder  
715 Ewald Ave SE  
Salem, OR 97302

**From:** [Wallingford Laurel](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 18, 2023 9:21:54 AM

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Dear Oregon Department of Environmental Quality,

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Regards,  
Wallingford Laurel  
19750 NW Baker Creek Rd  
Mcminnville, OR 97128

**From:** [storm33@everyactioncustom.com](mailto:storm33@everyactioncustom.com) on behalf of [Jean Svadlenka](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Monday, September 18, 2023 9:44:04 AM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Jean Svadlenka  
7010 SW Highland Ct Wilsonville, OR 97070-8761  
[storm33@sonic.net](mailto:storm33@sonic.net)

**From:** [Aprelle Banks](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Monday, September 18, 2023 11:14:40 AM

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We live in a world where every resource counts. When are lawmakers and legislation does not uphold basic policy to keep the environment that we have to live in safe, it makes everything just that much more complicated. Many more people are suffering needlessly. It is already happening everywhere around the globe. Sickness and disease are spreading far more rapidly than they ever have in any time. The ocean cannot oxidize, and we're losing more and more plants and animals that contribute to the ecosystem year after year. This will not happen in 20, 50, or 100 years from now, but it is happening right now. We have one planet. If Mars and Venus are not an example of what can happen when greenhouse gases are allowed to go wild, and unchecked within the atmosphere of a planet doesn't scare you, it should. There's not a speck of life on Mars or Venus, and Earth is just that size, yes, it's in the Goldilocks zone, but we still are at risk for this very thing happening on this planet. Natural gas is something that we should've done away with years ago. It's too toxic. It serves no purpose, and this all comes down to money. Yes, I said it all comes down to money. So you can ask yourself which one do you want to keep on doing, breathing and living, or making money. I'm not going to go into all the various reasons why natural gas should be eliminated from society, you know that. I am not going to go into why we should have a neutral carbon footprint, or zero emissions. You already know that. It is high time that the carbon footprint of the United States be one that of a carbon neutral country. It is not that difficult to make this happen. Instead of throwing things into the landfill, recycle them. Mini, Oregonians are doing just that. Now is the time for you to uphold your end of the deal. We have to live in a carbon, neutral world. None of us Oregonians can do anything about anything outside of the United States, but we definitely can affect Oregon. Do what's right, and step on the side of life and living. That's our reality, every single American only wants to live their best life. And all of you people who gained political and economical power, you have a responsibility to provide the means for that best life. Help Oregon to become carbon neutral no later than 2030. We can do it. We can start rolling away our dependency on natural gas, oil, and other non-renewable resources. Please, make the right decision today. Uphold the values, traditions, and more importantly, the spirit of freedom within every American, who bled, fought and died so that we all could live free. Living free does not mean that you have the right to kill us slowly. Living free does not mean you have the right to allow sickness and disease to spread. Moreover, living free does not mean that you have the right to force Oregonians to line your pockets. If you are offended by this, too bad, I don't really care. When you allow a carbon footprint to stay as high as it is, and we keep on relying upon coal, natural gas, oil, and all of these other non-renewable resources, you put us on a path of economic failure, sickness and disease, spreading, and inadequate infrastructure to handle societal collapse. Each and every one can strive to become better. These changes need to be made now. So, now is the time to stand up and do what's right.

Best regards,  
Aprelle Banks

If you can dream it, you can believe it, and if you can believe it, you can achieve it

**From:** [Adam Baker](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Comment on 2023 GHG Reporting and CPP Rulemaking - DEQ - H2 - Stationary Sources  
**Date:** Monday, September 18, 2023 12:17:03 PM

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You don't often get email from [adamlanebaker@gmail.com](mailto:adamlanebaker@gmail.com). [Learn why this is important](#)

Hello,

Thank you for providing an opportunity for public comment for DEQ Rulemaking in 2023. I am happy to see DEQ strengthening many areas of the CPP. In particular, I am excited to see Stationary Sources be included within this regulation, but I have a few concerns.

The amendments and rulemaking allow for book and claim of H2 injections based on the H2's carbon intensity. I like that this part of the regulation acknowledges the broad range of GHG emissions from H2 production based on the process and feedstock used.

However, when it comes to stationary source reporting, I am concerned with the definition of "Direct GHG emissions" in the Division 215 of the GHG reporting program as used in section 2 of 340-215-0030 and defined in sections 19 and 30 of 340-215-0020. These definitions exclude the consumption and emission of H2 for industrial processes. This concerns me because it makes it optional for large H2 consumers to report their H2 associated GHG emissions.

I understand that there can be a risk of double counting because H2 producers in Oregon will also have to report their CO2, but this policy choice poses several risk:

1. Stationary Sources could use carbon intensive H2 as a feedstock, fuel, or inert gas emitted directly to the atmosphere. In other words, Stationary Sources can keep emitting by using cheaper high carbon intensity H2 produced out of state and shipped in.
2. Without incentivizing Stationary Sources to use less carbon intensive H2, this could make Oregon H2 producers less competitive because they won't have consumers for low carbon intensity H2. This could lock out Oregon from getting the benefits from this industry growth as this technology becomes more developed because they won't have as large of an initial market.
3. We may fail to monitor Stationary Sources that are actually large emitters (>2500 MT CO2e if H2 associated emissions are concerned) if they are using a lot of more carbon intensive H2 that is not included in the current definition of "Direct GHG emissions". This is of particular concern for the semiconductor industry which uses large amounts of high purity (high value) H2 for a variety of purposes.

This could be fixed if the DEQ makes H2 consumption tracking mandatory for stationary sources that qualify and include the CO2e of that H2 in the emissions of those stationary sources. This will help incentivize the use of low carbon intensity H2 in industry.

My other major concern is how new entrants (new stationary sources) get evaluated on their initial CO2 caps. The best opportunity to lower emissions is at the design phase. This means that new construction should be subject to lower caps for their economic productivity than older facilities in the same industry. These expectations need to be clear for businesses.

Thank you again for doing this work. It is crucial for the health of our state and the future of

Oregonians to get this right. I hope you find this public comment helpful.

Best regards,  
Adam

**From:** William Heerdt <campaigns@good.do>  
**Sent:** Monday, September 18, 2023 12:34 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

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Department of Environmental Quality staff,

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By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

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By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system; and
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
William Heerdt

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Please reply to William Heerdt at wmheerdt@gmail.com.

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**From:** John Nettleton <campaigns@good.do>  
**Sent:** Monday, September 18, 2023 12:37 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

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Department of Environmental Quality staff,

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Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
John Nettleton  
Portland, Oregon, 97202, United States

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**From:** Debra Smith <campaigns@good.do>  
**Sent:** Monday, September 18, 2023 12:50 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

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Department of Environmental Quality staff,

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By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

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Thank you for the opportunity to provide comments.

Yours sincerely,  
Debra Smith

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**From:** Dana Weintraub <campaigns@good.do>  
**Sent:** Monday, September 18, 2023 1:11 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

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Thank you for the opportunity to provide comments.

Yours sincerely,  
Dana Weintraub  
Beaverton, Oregon, 97006, United States

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**From:** Steve Hanrahan <campaigns@good.do>  
**Sent:** Monday, September 18, 2023 1:17 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

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Thank you for the opportunity to provide comments.

Yours sincerely,  
Steve Hanrahan

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Please reply to Steve Hanrahan at [steve@lshanrahan.com](mailto:steve@lshanrahan.com).

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**From:** Juanita Rinas <campaigns@good.do>  
**Sent:** Monday, September 18, 2023 1:18 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

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Department of Environmental Quality staff,

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Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Juanita Rinas  
Eugene, Oregon, 97402, United States

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This email was sent by Juanita Rinas via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Juanita provided an email address (solacdnucs@yahoo.com) which we included in the REPLY-TO field.

Please reply to Juanita Rinas at solacdnucs@yahoo.com.

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**From:** Marianne Nelson Nelson <campaigns@good.do>  
**Sent:** Monday, September 18, 2023 1:38 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

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Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Marianne Nelson Nelson  
Portland, Oregon, 97215, United States

---

This email was sent by Marianne Nelson Nelson via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Marianne Nelson provided an email address (manelson316@yahoo.com) which we included in the REPLY-TO field.

Please reply to Marianne Nelson Nelson at manelson316@yahoo.com.

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**From:** Cheryl Hart <campaigns@good.do>  
**Sent:** Monday, September 18, 2023 2:09 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

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Department of Environmental Quality staff,

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Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Cheryl Hart

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This email was sent by Cheryl Hart via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Cheryl provided an email address (oregonchart@comcast.net) which we included in the REPLY-TO field.

Please reply to Cheryl Hart at oregonchart@comcast.net.

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**From:** Nancy Carl <campaigns@good.do>  
**Sent:** Monday, September 18, 2023 2:24 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

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Thank you for the opportunity to provide comments.

Yours sincerely,  
Nancy Carl

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This email was sent by Nancy Carl via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Nancy provided an email address (dlnlcarl2@gmail.com) which we included in the REPLY-TO field.

Please reply to Nancy Carl at dlnlcarl2@gmail.com.

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**From:** James Rankin <campaigns@good.do>  
**Sent:** Monday, September 18, 2023 2:47 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

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Thank you for the opportunity to provide comments.

Yours sincerely,  
James Rankin

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This email was sent by James Rankin via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however James provided an email address (jim.rankin@oregonstate.edu) which we included in the REPLY-TO field.

Please reply to James Rankin at jim.rankin@oregonstate.edu.

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**From:** Nancy Phillips <campaigns@good.do>  
**Sent:** Monday, September 18, 2023 3:02 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

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Thank you for the opportunity to provide comments.

Yours sincerely,  
Nancy Phillips  
La Pine, Oregon, 97739, United States

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This email was sent by Nancy Phillips via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Nancy provided an email address (harp8392@gmail.com) which we included in the REPLY-TO field.

Please reply to Nancy Phillips at harp8392@gmail.com.

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**From:** David Medford <campaigns@good.do>  
**Sent:** Monday, September 18, 2023 3:29 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

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Department of Environmental Quality staff,

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Thank you for the opportunity to provide comments.

Yours sincerely,  
David Medford  
Portland, Oregon, 97223, United States

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This email was sent by David Medford via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however David provided an email address (parkermedford@gmail.com) which we included in the REPLY-TO field.

Please reply to David Medford at parkermedford@gmail.com.

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**From:** David Nichols <campaigns@good.do>  
**Sent:** Monday, September 18, 2023 3:42 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

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Thank you for the opportunity to provide comments.

Yours sincerely,  
David Nichols

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Please reply to David Nichols at davemult@aol.com.

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**From:** William Obrien <campaigns@good.do>  
**Sent:** Monday, September 18, 2023 3:54 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

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Thank you for the opportunity to provide comments.

Yours sincerely,  
William Obrien

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Please reply to William Obrien at wobobr123@yahoo.com.

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**From:** Dorothy Tharsing Tharsing <campaigns@good.do>  
**Sent:** Monday, September 18, 2023 4:13 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

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Thank you for the opportunity to provide comments.

Yours sincerely,  
Dorothy Tharsing Tharsing  
Bandon, Oregon, 97411, United States

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This email was sent by Dorothy Tharsing Tharsing via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Dorothy Tharsing provided an email address (dtharsing@gmail.com) which we included in the REPLY-TO field.

Please reply to Dorothy Tharsing Tharsing at dtharsing@gmail.com.

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**From:** Dena Turner <campaigns@good.do>  
**Sent:** Monday, September 18, 2023 4:33 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

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Thank you for the opportunity to provide comments.

Yours sincerely,  
Dena Turner  
Portland, Oregon, 97215, United States

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Please reply to Dena Turner at denaturn62@gmail.com.

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**From:** Cherine Bauer <campaigns@good.do>  
**Sent:** Monday, September 18, 2023 4:33 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

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Thank you for the opportunity to provide comments.

Yours sincerely,  
Cherine Bauer

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Please reply to Cherine Bauer at cherinel@comcast.net.

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**From:** Tonya Stiffler <campaigns@good.do>  
**Sent:** Monday, September 18, 2023 4:49 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

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Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18-month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system; and
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Tonya Stiffler

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Please reply to Tonya Stiffler at [tstiffler@comcast.net](mailto:tstiffler@comcast.net).

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**From:** Linda W. Parmer Parmer <campaigns@good.do>  
**Sent:** Monday, September 18, 2023 5:23 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

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Department of Environmental Quality staff,

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I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18-month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

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Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Linda W. Parmer Parmer  
Portland, Oregon, 97213, United States

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Please reply to Linda W. Parmer Parmer at lwparmer@gmail.com.

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**From:** [Robbin Schindele](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 18, 2023 5:27:27 PM

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You don't often get email from [robbschindele@advocatefor.me](mailto:robbschindele@advocatefor.me). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Robbin Schindele  
PO Box 342  
Glide, OR 97443

**From:** [Megen Ickler](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 18, 2023 6:58:18 PM

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Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Megen Ickler  
6128 SE 77th Ave  
Portland, OR 97206

**From:** Robert Wright <campaigns@good.do>  
**Sent:** Monday, September 18, 2023 7:24 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

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Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18-month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system; and
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

In short, please make sure your final rules maximize benefits to the public and minimize benefits to polluting industries.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Robert Wright

Eugene, Oregon, 97403, United States

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This email was sent by Robert Wright via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Robert provided an email address (gbobw1943@comcast.net) which we included in the REPLY-TO field.

Please reply to Robert Wright at gbobw1943@comcast.net.

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**From:** [Charlie O'Neill \(charlieo553@gmail.com\) Sent You a Personal Message](mailto:charlieo553@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Monday, September 18, 2023 8:06:37 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

Corporations have to be held accountable for their part in the destruction.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Charlie O'Neill  
1900 W Gatesburg RD  
Warriors Mark, PA 16877  
charlieo553@gmail.com  
(814) 553-6222

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**From:** Susan Delles <campaigns@good.do>  
**Sent:** Monday, September 18, 2023 8:29 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

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Department of Environmental Quality staff,

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Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Susan Delles

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Please reply to Susan Delles at sdelles@jeffnet.org.

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**From:** Diane Luck <campaigns@good.do>  
**Sent:** Monday, September 18, 2023 8:40 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

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Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18-month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system; and
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Diane Luck

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This email was sent by Diane Luck via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Diane provided an email address (dianeluck@mac.com) which we included in the REPLY-TO field.

Please reply to Diane Luck at dianeluck@mac.com.

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**From:** Lorina Alfaro <campaigns@good.do>  
**Sent:** Monday, September 18, 2023 8:42 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

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Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

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By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

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- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system; and
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Lorina Alfaro

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This email was sent by Lorina Alfaro via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Lorina provided an email address (lorinaalfaro@gmail.com) which we included in the REPLY-TO field.

Please reply to Lorina Alfaro at lorinaalfaro@gmail.com.

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**From:** [jeanella2@everyactioncustom.com](mailto:jeanella2@everyactioncustom.com) on behalf of [Jean Ella](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Monday, September 18, 2023 8:54:31 PM

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Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Jean Ella  
3018 Heron Loop SE Albany, OR 97322-7361  
[jeanella2@gmail.com](mailto:jeanella2@gmail.com)

**From:** [Blythe Clark-McKittrick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 18, 2023 8:55:03 PM

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You don't often get email from [blythepatricia@p2a.co](mailto:blythepatricia@p2a.co). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Blythe Clark-McKittrick  
514 SE Belmont St  
Portland, OR 97214

**From:** [niomi.r.markel@everyactioncustom.com](mailto:niomi.r.markel@everyactioncustom.com) on behalf of [Niomi Markel](#)  
**To:** [CFP2022 \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Monday, September 18, 2023 9:13:51 PM

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Dear Oregon Department of Environmental Quality,

I am 18 years old and already dealing with the effects of climate change that politicians said wouldn't happen until generations into the future. Summer has turned from a time of vacation and relaxation into three hellish months hiding indoors from wildfire smoke. Now is not the time to be gutting climate protections. The Climate Protection Program (CPP) is a program that is absolutely essential to achieving our state's climate pollution reduction goals, and it was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process. I am concerned that DEQ's current proposed rules would effectively undermine the CPP.

Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone CPP, this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I therefore strongly urge DEQ to amend the proposed rules to help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you.

Sincerely,  
Niomi Markel  
3587 SE Sherman St Portland, OR 97214-5851  
[niomi.r.markel@gmail.com](mailto:niomi.r.markel@gmail.com)

**From:** [Martin Kilmer](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 18, 2023 9:14:30 PM

---

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Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Martin Kilmer  
777 Crest Dr  
Eugene, OR 97405

**From:** [Carlee Kelly](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 18, 2023 9:46:51 PM

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You don't often get email from [carlee@advocatesmessage.com](mailto:carlee@advocatesmessage.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Carlee Kelly  
273 Evergreen Rd  
Lake Oswego, OR 97034

**From:** [Beki White](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 18, 2023 10:20:59 PM

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Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

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most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Beki White  
738 NE Newport Heights Dr  
Newport, OR 97365

**From:** Tascha Babitch <campaigns@good.do>  
**Sent:** Monday, September 18, 2023 11:36 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

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Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18-month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system; and
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Tascha Babitch  
Portland, Oregon, 97214, United States

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Please reply to Tascha Babitch at amiwoman@gmail.com.

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**From:** Colleen Taylor <campaigns@good.do>  
**Sent:** Monday, September 18, 2023 11:57 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

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Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits— ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Colleen Taylor

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Please reply to Colleen Taylor at colecanplay@comcast.net.

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**From:** Anthony Pepitone <campaigns@good.do>  
**Sent:** Tuesday, September 19, 2023 5:44 AM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

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Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Anthony Pepitone

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Please reply to Anthony Pepitone at [apepitone@gmail.com](mailto:apepitone@gmail.com).

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**From:** Charles Causey <campaigns@good.do>  
**Sent:** Tuesday, September 19, 2023 6:25 AM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

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Thank you for the opportunity to provide comments.

Yours sincerely,  
Charles Causey

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This email was sent by Charles Causey via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Charles provided an email address (causeys@gmail.com) which we included in the REPLY-TO field.

Please reply to Charles Causey at causeys@gmail.com.

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**From:** Deborah Clark <campaigns@good.do>  
**Sent:** Tuesday, September 19, 2023 6:59 AM  
**To:** 2023 Climate \* DEQ  
**Subject:** The Climate Protection Program needs to be strengthened not weakened

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Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on the Department of Environmental Quality (DEQ)'s 2023 climate rulemaking. Oregon's Climate Protection Program (CPP) is vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I am concerned that the DEQ's current draft rules will weaken Oregon's Climate Protection Program. Specifically, I am concerned that DEQ's current draft rules

- would allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. Biomethane used for CCP compliance needs to be restricted to only biomethane that is injected into a pipeline within Oregon.
- would not ensure that the hydrogen counted for CPP compliance is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system. Hydrogen is a leak-prone gas, and the risks of hydrogen leakage must be incorporated into our decision-making.
- would enable the expansion of new large industrial emitters without their being accountable for their greenhouse gas emissions. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger Climate Protection Program that prioritizes benefits for Oregon's families and communities.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Deborah Clark

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This email was sent by Deborah Clark via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Deborah provided an email address (mizdclark@gmail.com) which we included in the REPLY-TO field.

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**From:** Mary McGaughey <campaigns@good.do>  
**Sent:** Tuesday, September 19, 2023 7:23 AM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

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Thank you for the opportunity to provide comments.

Yours sincerely,  
Mary McGaughey  
Gresham, Oregon, 97030, United States

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This email was sent by Mary McGaughey via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Mary provided an email address (marymcgaughey@yahoo.com) which we included in the REPLY-TO field.

Please reply to Mary McGaughey at marymcgaughey@yahoo.com.

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**From:** [Amber Shull](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, September 19, 2023 7:25:23 AM

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Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Amber Shull  
12070 SW Fischer Rd  
Portland, OR 97224

**From:** [Sharon Utterback](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, September 19, 2023 8:16:04 AM

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You don't often get email from sharsant37@p2a.co. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Sharon Utterback  
1736 N Holman St  
Portland, OR 97217

**From:** Aya Vitello <campaigns@good.do>  
**Sent:** Tuesday, September 19, 2023 8:40 AM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

[You don't often get email from campaigns@good.do. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18-month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system; and
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Aya Vitello  
Beaverton, Oregon, 97008, United States

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This email was sent by Aya Vitello via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Aya provided an email address (ayahirai@gmail.com) which we included in the REPLY-TO field.

Please reply to Aya Vitello at ayahirai@gmail.com.

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**From:** [Margaret Dudley](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, September 19, 2023 10:32:14 AM

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You don't often get email from jennydudley1941@grsdelivery.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

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Regards,  
Margaret Dudley  
17743 SE Paradise Dr  
Milwaukie, OR 97267

**From:** [cheryl kolander](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, September 19, 2023 11:03:13 AM

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You don't often get email from ckolander@grassrootsmessage.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

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Regards,  
cheryl kolander  
9644 N Pier Park Pl  
Portland, OR 97203

**From:** [Rebel Russell](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, September 19, 2023 11:25:37 AM

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You don't often get email from rebelrussel56@sendgrassroots.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Rebel Russell  
16745 SE Division St Unit 134  
Portland, OR 97236

**From:** [Lori Duda](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, September 19, 2023 11:32:39 AM

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You don't often get email from johnduda32760@sendgrassroots.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Lori Duda  
PO Box 7412  
Bend, OR 97708

**From:** Randall Nerwick Nerwick <campaigns@good.do>  
**Sent:** Tuesday, September 19, 2023 11:52 AM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP— a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18-month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system; and
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits— ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Randall Nerwick Nerwick  
Milwaukie, Oregon, 97222, United States

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This email was sent by Randall Nerwick Nerwick via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to

our generic no-reply address at campaigns@good.do, however Randall Nerwick provided an email address (rnerwick@gmail.com) which we included in the REPLY-TO field.

Please reply to Randall Nerwick Nerwick at rnerwick@gmail.com.

To learn more about Do Gooder visit

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**From:** [Roxanne Dalton](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, September 19, 2023 3:29:52 PM

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Dear Oregon Department of Environmental Quality,

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The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
Roxanne Dalton  
13060 SW Carmel St  
Portland, OR 97224

**From:** [BC Shelby](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, September 19, 2023 3:29:53 PM

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You don't often get email from bcshelby@gmail.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

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Sincerely,  
BC Shelby  
1040 NW 10th Ave Apt 525  
Portland, OR 97209

**From:** [Sam Wardwell](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, September 19, 2023 3:29:53 PM

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You don't often get email from sam.wardwell96@gmail.com. [Learn why this is important](#)

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Thank you for considering these comments and recommendations.

Sincerely,  
Sam Wardwell  
4325 SE 16th Ave  
Portland, OR 97202

**From:** [Kay TOUSLEY](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, September 19, 2023 3:29:54 PM

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You don't often get email from ketousle@msn.com. [Learn why this is important](#)

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Thank you for considering these comments and recommendations.

This is long, but it clearly states what I believe.

Sincerely,  
Kay TOUSLEY  
1400 NE 2nd Ave Apt 1611  
Portland, OR 97232

**From:** [John Nettleton](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, September 19, 2023 3:29:55 PM

---

You don't often get email from [jpn5710@yahoo.com](mailto:jpn5710@yahoo.com). [Learn why this is important](#)

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Thank you for considering these comments and recommendations.

Sincerely,  
John Nettleton  
4311 SE 37th Ave Apt 21  
Portland, OR 97202

**From:** [Brice Suprenant](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, September 19, 2023 3:29:55 PM

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You don't often get email from bsuprena@live.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

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Sincerely,  
Brice Suprenant  
5404 SE 68th Ave  
Portland, OR 97206

**From:** [B. Greene](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, September 19, 2023 3:29:56 PM

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You don't often get email from [bgreen@flyingfocus.org](mailto:bgreen@flyingfocus.org). [Learn why this is important](#)

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Sincerely,

B. Greene

4637 N Congress Ave, Portland, OR  
portland, OR 97217

**From:** [David Regan](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, September 19, 2023 3:29:56 PM

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You don't often get email from dregan02@msn.com. [Learn why this is important](#)

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Sincerely,  
David Regan  
623 SW Park Ave  
Portland, OR 97205

**From:** [Jacob Apenes](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, September 19, 2023 3:29:57 PM

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You don't often get email from japenes@gmail.com. [Learn why this is important](#)

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Sincerely,  
Jacob Apenes  
4702 NE 20th Ave  
Portland, OR 97211

**From:** [Autumn Davidson](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, September 19, 2023 3:29:57 PM

---

You don't often get email from davidson.autumn@gmail.com. [Learn why this is important](#)

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Sincerely,  
Autumn Davidson  
1533 N Jarrett St  
Portland, OR 97217

**From:** [Kathleen Ruiz](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, September 19, 2023 3:29:58 PM

---

You don't often get email from [kat77klaws@gmail.com](mailto:kat77klaws@gmail.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

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Sincerely,  
Kathleen Ruiz  
726 2nd Avenue  
Seaside, OR 97138

**From:** [Catherine Reynolds](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, September 19, 2023 3:29:58 PM

---

You don't often get email from catherinereynolds@comcast.net. [Learn why this is important](#)

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Thank you for considering these comments and recommendations.

Please continue to push to prioritize our health and the health of our planet by meeting these goals.

Sincerely,  
Catherine Reynolds  
9705 sw vista place  
portland, OR 97225

**From:** [Susan Mates](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, September 19, 2023 3:29:59 PM

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You don't often get email from [smmates@gmail.com](mailto:smmates@gmail.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

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Thank you for considering these comments and recommendations.

I can't think of anything more important than these goals. Please hold the line on these critical pollution standards.

Sincerely,  
Susan Mates  
8945 NW Oak St  
Portland, OR 97229

**From:** [Ava Reynolds](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, September 19, 2023 3:29:59 PM

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You don't often get email from [avaquinnr@icloud.com](mailto:avaquinnr@icloud.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

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The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
Ava Reynolds  
9705 sw vista pl  
portland, OR 97225

**From:** [Linda Ramachandran](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, September 19, 2023 3:29:59 PM

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You don't often get email from [cheerfulcherubs@grassrootsmessage.com](mailto:cheerfulcherubs@grassrootsmessage.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Linda Ramachandran  
2627 SE 136th Ave  
Portland, OR 97236

**From:** [Dave Ruud](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, September 19, 2023 3:30:00 PM

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You don't often get email from daveagg@msn.com. [Learn why this is important](#)

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Thank you for considering these comments and recommendations.

Sincerely,  
Dave Ruud  
14139 NW Charlton Rd  
Portland, OR 97231

**From:** [CHERYL TROSPER](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, September 19, 2023 3:30:00 PM

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You don't often get email from cherylt4235@gmail.com. [Learn why this is important](#)

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Thank you for considering these comments and recommendations.

Sincerely,  
CHERYL TROSPER  
4235 SE Holgate Blvd  
Portland, OR 97206

**From:** [Linore Blackstone](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, September 19, 2023 3:30:01 PM

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You don't often get email from llblackstone@comcast.net. [Learn why this is important](#)

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Thank you for considering these comments and recommendations.

Dear DEQ, this may be my 2nd note to you as I see this is an important, in fact, vital, critical move to regulate our behavior as the dominant species who continue to manipulate, obfuscate, truncate--sorry--the knowledge of the emergency.

Sincerely,  
Linore Blackstone  
1745 NE 49th Avenue  
Portland, OR 97213

**From:** [Tara Ohta](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, September 19, 2023 3:30:01 PM

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You don't often get email from tara\_ohta@hotmail.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

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Thank you for considering these comments and recommendations.

Sincerely,  
Tara Ohta  
3258 SE Morrison St  
Portland, OR 97214

**From:** [Mandy Allen](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, September 19, 2023 3:30:02 PM

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You don't often get email from [anodizer@gmail.com](mailto:anodizer@gmail.com). [Learn why this is important](#)

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Thank you for considering these comments and recommendations.

Sincerely,  
Mandy Allen  
5855 NE 33rd Ave  
Portland, OR 97211

**From:** [Gillian Barlow Graham](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, September 19, 2023 3:30:02 PM

---

You don't often get email from [gillianbarlowgraham@gmail.com](mailto:gillianbarlowgraham@gmail.com). [Learn why this is important](#)

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Sincerely,  
Gillian Barlow Graham  
13655 Southwest 22nd Street  
Beaverton, OR 97008

**From:** [Marjorie Nafziger](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, September 19, 2023 3:30:03 PM

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You don't often get email from [marjorie.nafziger@gmail.com](mailto:marjorie.nafziger@gmail.com). [Learn why this is important](#)

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Sincerely,  
Marjorie Nafziger  
1804 SE Ellis St  
Portland, OR 97202

**From:** [Phil Houston Goldsmith](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, September 19, 2023 3:30:04 PM

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Sincerely,  
Phil Houston Goldsmith  
3110 NW 112th Pl  
Portland, OR 97229

**From:** [Dana Weintraub](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, September 19, 2023 3:30:04 PM

---

You don't often get email from [mrdanaweintraub@tutanota.com](mailto:mrdanaweintraub@tutanota.com). [Learn why this is important](#)

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Sincerely,  
Dana Weintraub  
17124 SW Marty Ln  
Beaverton, OR 97003

**From:** [Maureen OBrien](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, September 19, 2023 3:30:04 PM

---

You don't often get email from obrienmaureenmargaret@gmail.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

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Sincerely,  
Maureen OBrien  
1612 NE Junior St  
Portland, OR 97211

**From:** [Francisco Gadea](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, September 19, 2023 3:30:05 PM

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You don't often get email from frankie0004260@gmail.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

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- 3) Achieving real reduction of emissions by 50%, rather than allowing companies to invest in biomass-derived fuels such as "renewable natural gas" (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
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The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
Francisco Gadea  
3519 NE 15th Ave PMB 166  
Portland, OR 97212

**From:** [Jay Humphrey](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, September 19, 2023 3:30:05 PM

---

You don't often get email from blue1jay@yahoo.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

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Thank you for considering these comments and recommendations.

Oregon

Sincerely,  
Jay Humphrey  
25525 S Laura Ln  
Estacada, OR 97023

**From:** [Bill OBrien](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, September 19, 2023 3:30:05 PM

---

You don't often get email from wobobr123@yahoo.com. [Learn why this is important](#)

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Thank you for considering these comments and recommendations.

Sincerely,  
Bill OBrien  
12520 SW Gem Ln Apt 202  
Beaverton, OR 97005

**From:** [Laura Ladd](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, September 19, 2023 3:30:05 PM

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You don't often get email from [lauraandmarda@grassrootsmessage.com](mailto:lauraandmarda@grassrootsmessage.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Laura Ladd  
5060 Barnes Ct SE  
Salem, OR 97306

**From:** [Micki Selvitella](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, September 19, 2023 3:30:06 PM

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You don't often get email from mickiselvitella@gmail.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

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Thank you for considering these comments and recommendations.

Sincerely,  
Micki Selvitella  
3340 SE Morrison St.  
Portland, OR 97214

**From:** [Debra Smith](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, September 19, 2023 3:30:06 PM

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You don't often get email from rubydeb5@yahoo.com. [Learn why this is important](#)

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Sincerely,  
Debra Smith  
14561 SE Garland Ln  
Portland, OR 97267

**From:** [Ryan Beam](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, September 19, 2023 3:30:07 PM

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You don't often get email from beam.ryan.d@gmail.com. [Learn why this is important](#)

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Sincerely,  
Ryan Beam  
5838 NE Wygant St  
Portland, OR 97218

**From:** [Sharon Hunt](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, September 19, 2023 3:30:07 PM

---

You don't often get email from gvsahunt@comcast.net. [Learn why this is important](#)

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OR

Sincerely,  
Sharon Hunt  
17227 SW Loma Vista St.  
Aloha, OR 97007

**From:** [Monica Gilman](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, September 19, 2023 3:30:08 PM

---

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Sincerely,  
Monica Gilman  
25525 S. Laura Ln  
Estacada, OR 97023

**From:** [Norma Silliman](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, September 19, 2023 3:30:08 PM

---

You don't often get email from [normaruth.silliman@gmail.com](mailto:normaruth.silliman@gmail.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

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Thank you for considering these comments and recommendations.

Your agency is first and foremost accountable to the ordinary people living in Oregon, not the corporate polluters. You must implement the program as intended, reducing pollution and the rapid degradation of our climate. Thank you.

Sincerely,  
Norma Silliman  
4921 SE 79TH AVE, unit B  
Portland, OR 97206

**From:** [Nina French](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, September 19, 2023 3:30:08 PM

---

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Thank you for considering these comments and recommendations.

I agree with this petition. Do not aspire to be Seattle or the State of Washington. They destroy Whistleblowers and allow their government to behave like Amazon. WASHINGTON STATE DEPARTMENT OF HEALTH IS MISOGYNISTIC AND DESTROYS WOMEN'S LIVES.

Sincerely,  
Nina French  
8647 NE Tillamook St  
Portland, OR 97220

**From:** [Benjamin Platt](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, September 19, 2023 3:30:09 PM

---

You don't often get email from benplatt59@gmail.com. [Learn why this is important](#)

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Thank you for considering these comments and recommendations.

In these times of continuously escalating climate emergency, it's important that we strengthen our commitment to fixing things rather than backpedaling. We need to act immediately and decisively, and the CPP represents a great opportunity to do so.

Sincerely,  
Benjamin Platt  
3837 SE Brooklyn St  
Portland, OR 97202

**From:** [Robert Bresky](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, September 19, 2023 3:30:10 PM

---

You don't often get email from bobthenatureguy@gmail.com. [Learn why this is important](#)

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- 3) Achieving real reduction of emissions by 50%, rather than allowing companies to invest in biomass-derived fuels such as "renewable natural gas" (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
- 4) Holding big polluters accountable to engage in science-based "best available emissions reductions" (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.
- 5) Returning the date for a "new source" of stationary pollution to December 31, 2021.

The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
Robert Bresky  
16114 S Hattan Rd  
Oregon City, OR 97045

**From:** [Baylee Merlock](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, September 19, 2023 3:30:10 PM

---

You don't often get email from bayleerae1204@grassrootsmessage.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Baylee Merlock  
124 Dobie Ct  
Roseburg, OR 97470

**From:** [Judith Lienhard](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, September 19, 2023 3:30:10 PM

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You don't often get email from lienjud@aol.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

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However, I was disappointed to hear that the recent rule-making table did not include community input, and also that the results lacked in meeting the plan's original goals of reducing greenhouse gas emissions by 50%, providing meaningful investments to benefit Oregonians, and holding big polluters accountable.

Therefore, I am calling on the DEQ to adapt the rules for CPP implementation to focus on the original goals of:

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The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
Judith Lienhard  
4455 SW 94th Ave  
Portland, OR 97225

**From:** [Laura Hanks](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, September 19, 2023 3:30:11 PM

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You don't often get email from [laura.hanks7@gmail.com](mailto:laura.hanks7@gmail.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

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Thank you for considering these comments and recommendations.

Sincerely,  
Laura Hanks  
6281 SE Deering Ct  
Portland, OR 97222

**From:** [caroline bleckmann](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, September 19, 2023 3:30:11 PM

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You don't often get email from [caroline.bowles@gmail.com](mailto:caroline.bowles@gmail.com). [Learn why this is important](#)

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Sincerely,  
caroline bleckmann  
1907 SE 34th Ave  
Portland, OR 97214

**From:** [Joni Zimmerman](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, September 19, 2023 3:30:12 PM

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You don't often get email from jonizim@gmail.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

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Sincerely,  
Joni Zimmerman  
1101 W Sheridan St  
Newberg, OR 97132

**From:** [Ljupka Berberovic](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, September 19, 2023 3:30:12 PM

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You don't often get email from berber4@comcast.net. [Learn why this is important](#)

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Sincerely,  
Ljupka Berberovic  
7915 SW 83Rd Ave  
Portland, OR 97223

**From:** [Rebekah Woodford](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, September 19, 2023 3:30:13 PM

---

You don't often get email from [bekanichelephoto@grassrootsmessage.com](mailto:bekanichelephoto@grassrootsmessage.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Rebekah Woodford  
1212 NE Linden Ave  
Gresham, OR 97030

**From:** [amy\\_minato](mailto:amy_minato)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, September 19, 2023 3:30:13 PM

---

You don't often get email from amyminato@gmail.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

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Thank you for considering these comments and recommendations.

Air pollution is linked to one in five deaths worldwide.  
Clean air is a basic human right. Help us protect it!

Sincerely,  
amy minato  
3525 SW Logan St  
Portland, OR 97219

**From:** [George Feldman](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, September 19, 2023 3:30:13 PM

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You don't often get email from feldmange@gmail.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

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Sincerely,  
George Feldman  
11230 S Collina Ave  
Portland, OR 97219

**From:** [Susan Connolly](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, September 19, 2023 3:30:13 PM

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You don't often get email from susanmconnolly@yahoo.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

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Thank you for considering these comments and recommendations.

Please act like your children, grandchildren and all future people's lives depend on it. They do.  
Thank you.

Sincerely,  
Susan Connolly  
236 W 15TH AVE  
EUGENE, OR 97401

**From:** [Ruba Leech](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, September 19, 2023 3:30:14 PM

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You don't often get email from ruba\_t@hotmail.com. [Learn why this is important](#)

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Sincerely,  
Ruba Leech  
1128 Ne Emerson  
Portland, OR 97211

**From:** [Beth Levin](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, September 19, 2023 3:30:15 PM

---

You don't often get email from levin.beth@gmail.com. [Learn why this is important](#)

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- 3) Achieving real reduction of emissions by 50%, rather than allowing companies to invest in biomass-derived fuels such as "renewable natural gas" (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
- 4) Holding big polluters accountable to engage in science-based "best available emissions reductions" (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.
- 5) Returning the date for a "new source" of stationary pollution to December 31, 2021.

The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
Beth Levin  
3043 NE 51st Ave  
Portland, OR 97213

**From:** [Peter Miller](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, September 19, 2023 3:30:16 PM

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You don't often get email from peteskitoo@gmail.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

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Sincerely,  
Peter Miller  
1706 SE 30th Ave  
Portland, OR 97214

**From:** [Donna Wehrley](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, September 19, 2023 3:30:16 PM

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You don't often get email from [thewehrleys@yahoo.com](mailto:thewehrleys@yahoo.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

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Sincerely,  
Donna Wehrley  
307 E 2nd Ave  
Mosier, OR 97040

**From:** [Helen Anderson](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, September 19, 2023 3:30:16 PM

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You don't often get email from gabesgrandma1939@yahoo.com. [Learn why this is important](#)

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Thank you for considering these comments and recommendations.

Sincerely,  
Helen Anderson  
435 E Exeter St  
Gladstone, OR 97027

**From:** [Jean Lofy](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, September 19, 2023 3:30:16 PM

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You don't often get email from jeanlofy@gmail.com. [Learn why this is important](#)

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Thank you for considering these comments and recommendations.

Sincerely,  
Jean Lofy  
13505 SE River Rd, #7105  
Portland, OR 97222

**From:** [David Medford](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, September 19, 2023 3:30:16 PM

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You don't often get email from parkermedford@gmail.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

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Thank you for considering these comments and recommendations.

There is no legitimate excuse to not transition to 100% renewables . My household has produced 100% of our electricity needs since 2017 , after installing 51 solar panels on our home's roof . The technology is already here!

Sincerely,  
David Medford  
7020 SW 82nd Ave  
Portland, OR 97223

**From:** [Kelsey Baker](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, September 19, 2023 3:30:17 PM

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You don't often get email from klsbkr777@gmail.com. [Learn why this is important](#)

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Sincerely,  
Kelsey Baker  
4142 NE 63rd Ave  
Portland, OR 97218

**From:** [Chanze Kratz](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, September 19, 2023 3:30:17 PM

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You don't often get email from [chanzepants@grassrootsmessage.com](mailto:chanzepants@grassrootsmessage.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Chanze Kratz  
1305 SE 5th St  
Gresham, OR 97080

**From:** [Bridget Wyatt](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, September 19, 2023 3:30:18 PM

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You don't often get email from [bridgetmichelle07@gmail.com](mailto:bridgetmichelle07@gmail.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

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Thank you for considering these comments and recommendations.

Sincerely,  
Bridget Wyatt  
783 NW Naito Pkwy  
Portland, OR 97209

**From:** [Betsy Toll](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, September 19, 2023 3:58:39 PM

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You don't often get email from [betsy@livingearthoregon.org](mailto:betsy@livingearthoregon.org). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

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Thank you for considering these comments and recommendations.

DEQ needs to give new power to Oregon's former reputation as a climate leader, not a laggard. Now's the time to adapt bold, clear rules for CPP implementation and show Oregon knows what it will take to create a clean climate future.

Sincerely,  
Betsy Toll  
3841 SE 51st Ave.  
Portland, OR 97206

**From:** [Jasper Hayes](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, September 19, 2023 4:31:58 PM

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You don't often get email from [jaspersb0ngwater666@forgrassroots.com](mailto:jaspersb0ngwater666@forgrassroots.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Jasper Hayes  
3322 Turner Rd SE  
Salem, OR 97302

**From:** [Drew Barowicz](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Tuesday, September 19, 2023 5:30:53 PM

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You don't often get email from dbarowicz@gmail.com. [Learn why this is important](#)

Hi there,

Thank you I'm advance for taking the time to read my message.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon.

Kindly,  
Drew

**From:** [Buck Olen](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, September 19, 2023 6:55:51 PM

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You don't often get email from westcoastbywheel@forgrassroots.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Buck Olen  
2325 Adams St  
Eugene, OR 97405

**From:** Marissa Wolfheart <campaigns@good.do>  
**Sent:** Tuesday, September 19, 2023 7:46 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18-month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system; and
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Marissa Wolfheart  
Portland, Oregon, 97206, United States

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This email was sent by Marissa Wolfheart via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our

generic no-reply address at campaigns@good.do, however Marissa provided an email address (marissawolfheart@gmail.com) which we included in the REPLY-TO field.

Please reply to Marissa Wolfheart at marissawolfheart@gmail.com.

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**From:** [Marilyn Feldhaus](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep the Climate Protection Plan strong  
**Date:** Tuesday, September 19, 2023 8:01:18 PM

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Dear DEQ;

I support a stronger Climate Protection Plan, not a weaker one. I understand big polluters would like to weaken the CPP. In my view, this would be most harmful for our environment which is under threat from ever worsening pollution and emission of harmful greenhouse gases.

Please do not bow to big polluting companies' pressure tactics!

Sincerely,

Marilyn Feldhaus  
12701 SE River Rd  
Portland, OR 97222

**From:** [Naomi Cruz-Blouin](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, September 19, 2023 9:09:47 PM

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You don't often get email from naomicruzbl@grsdelivery.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Naomi Cruz-Blouin  
1604 E 10th St  
The Dalles, OR 97058

**From:** [Art Hanson \(ahansomn47@comcast.net\) Sent You a Personal Message](mailto:ahansomn47@comcast.net)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Tuesday, September 19, 2023 10:26:08 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

However, you MUST do MUCH more. We MUST keep ALL climate-changing fossil fuels IN THE GROUND! We MUST achieve 100% clean, renewable energy like solar and wind in electrical generation and transportation by 2030.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Art Hanson  
1815 Briarwood Dr  
Lansing, MI 48917  
ahansomn47@comcast.net  
(517) 420-4314

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** Ben Basin <campaigns@good.do>  
**Sent:** Tuesday, September 19, 2023 11:03 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP— a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18-month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system; and
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits— ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Ben Basin

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This email was sent by Ben Basin via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic

no-reply address at campaigns@good.do, however Ben provided an email address (ben\_basin@yahoo.com) which we included in the REPLY-TO field.

Please reply to Ben Basin at ben\_basin@yahoo.com.

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**From:** [Bill Steimer](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Stronger CPP's  
**Date:** Wednesday, September 20, 2023 7:42:59 AM

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**Please resist all efforts to weaken the CPP.**

Sent from Gmail Mobile

**From:** [Lauren Koentje \(lmurray@ahrc.org\) Sent You a Personal Message](mailto:Lauren.Koentje@ahrc.org)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 7:55:22 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Lauren Koentje  
1337 10th St  
West Babylon, NY 11704  
lmurray@ahrc.org  
(516) 316-1929

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Rosalyn Gallo](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Climate Protection Plan  
**Date:** Wednesday, September 20, 2023 8:15:57 AM

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[You don't often get email from rosalyn.gallo@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

To whom it may concern:

I am a senior living in a retirement community overlooking the lovely Willamette River. I understand that Oregon's Climate Protection Plan (CPP) is under assault from big polluting companies. Please do not allow these companies to weaken the CPP. It's important to me that we work towards a cleaner environment, not simply for myself but for my family and the families of our state, now and for decades to come.

Respectfully,  
Rosalyn Gallo

**From:** Karen Smith <campaigns@good.do>  
**Sent:** Wednesday, September 20, 2023 8:45 AM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18-month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

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- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Karen Smith  
Corvallis, Oregon, 97330, United States

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This email was sent by Karen Smith via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic

no-reply address at campaigns@good.do, however Karen provided an email address (kmsmith42@gmail.com) which we included in the REPLY-TO field.

Please reply to Karen Smith at kmsmith42@gmail.com.

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**From:** [Jerry Banks \(jbanks4710@gmail.com\) Sent You a Personal Message](mailto:jbanks4710@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 8:57:35 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Jerry Banks  
1108 Ashbury Dr.  
Decatur, GA 30030  
[jbanks4710@gmail.com](mailto:jbanks4710@gmail.com)  
(404) 909-5286

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** ilene moss <campaigns@good.do>  
**Sent:** Wednesday, September 20, 2023 9:44 AM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

Oregon MUST stay on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon - there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered!

I am concerned that DEQ's current proposed rules would effectively undermine the CPP— a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18-month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system; and
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits— ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
ilene moss  
Portland, Oregon, 97211, United States

---

This email was sent by ilene moss via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however ilene provided an email address (abilene9@comcast.net) which we included in the REPLY-TO field.

Please reply to ilene moss at abilene9@comcast.net.

To learn more about Do Gooder visit

<https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.dogooder.co%2F&data=05%7C01%7CClimate.2023%40stateoforegon.mail.onmicrosoft.com%7C1e837791e74044196bae08dbb9f8d59b%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C638308250615650465%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ikk1haWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=IdeAfVQNxoB8JYb7ZOHD%2B8L9uPxJN1t5Sg61jOZ7Nbl%3D&reserved=0>

To learn more about web protocol RFC 3834 visit:

<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Ftools.ietf.org%2Fhtml%2Frfc3834&data=05%7C01%7CClimate.2023%40stateoforegon.mail.onmicrosoft.com%7C1e837791e74044196bae08dbb9f8d59b%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C638308250615650465%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ikk1haWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=RTkW2f0DDOMAKA757XSqHZo48K0%2FJ9S8%2FfnjCxf6kY%3D&reserved=0>

**From:** [Milton+And+Shirley Nelson \(masflo222@gmail.com\)](mailto:masflo222@gmail.com) Sent You a Personal Message  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 10:41:58 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
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I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Milton+And+Shirley Nelson  
1451 Spruce St. #323  
Florence, OR 97439  
[masflo222@gmail.com](mailto:masflo222@gmail.com)  
(541) 373-0033

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [david.kirkpatrick \(1939kirk@gmail.com\) Sent You a Personal Message](mailto:david.kirkpatrick@sierraclub.org)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 10:46:12 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

Stop pollution. Thank you.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

david.kirkpatrick  
101 scenic  
Ashland, OR 97520  
1939kirk@gmail.com  
(604) 913-2000

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club.

If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Kari Hunter \(kari.j.hunter@gmail.com\) Sent You a Personal Message](mailto:kari.j.hunter@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 10:46:20 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

The unfortunate truth is that many polluters will actively seek out loopholes in order to avoid addressing harmful effects of their practices, I cliso g effects that harm uncountable lives, present and future.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Kari Hunter  
7718 SE Division St  
Portland, OR 97206  
[kari.j.hunter@gmail.com](mailto:kari.j.hunter@gmail.com)  
(503) 964-4236

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Jean Vinson \(jeanvinson@comcast.net\) Sent You a Personal Message](mailto:jeanvinson@comcast.net)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 10:46:21 AM

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Thank you for the opportunity to provide comments.

Sincerely,

Jean Vinson  
655 Goodpasture Is. Rd.  
Eugene, OR 97401  
[jeanvinson@comcast.net](mailto:jeanvinson@comcast.net)  
(541) 953-1285

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**From:** [Deborah Lackowitz \(debbie061653@aol.com\) Sent You a Personal Message](mailto:debbie061653@aol.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 10:47:27 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Deborah Lackowitz  
1911 North Pine Street, Canby, OR, USA  
Canby, OR 97013  
debbie061653@aol.com  
(914) 733-5657

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Jesse and Lara Whitworth \(wanderingmuse@yahoo.com\) Sent You a Personal Message](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 10:47:31 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

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Thank you for the opportunity to provide comments.

Sincerely,

Jesse and Lara Whitworth  
35108 Perki's Creek Rd  
Cottage Grove, OR 97424  
wanderingmuse@yahoo.com  
(541) 942-6486

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**From:** [Carol Wagner \(carol@craftedbycarol.com\) Sent You a Personal Message](mailto:carol@craftedbycarol.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 10:47:32 AM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Carol Wagner  
350 Timber Ridge St NE , Apt 232  
Albany, OR 97322  
carol@craftedbycarol.com  
(503) 407-6726

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Robert Gibson \(robgibson1031@gmail.com\)](mailto:robgibson1031@gmail.com) Sent You a Personal Message  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 10:48:28 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Robert Gibson  
206 Harrison St  
Ashland, OR 97520  
[robgibson1031@gmail.com](mailto:robgibson1031@gmail.com)  
(808) 281-6569

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Kay Hagen \(kprismk@aol.com\) Sent You a Personal Message](mailto:kprismk@aol.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 10:50:01 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

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Thank you for the opportunity to provide comments.

Sincerely,

Kay Hagen  
631 Spring Creek Dr  
Ashland, OR 97520  
kprismk@aol.com  
(541) 973-8657

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Kevin Quinn \(qman714@hotmail.com\) Sent You a Personal Message](mailto:qman714@hotmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 10:50:12 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

This is an urgent request - we are out of time....

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Kevin Quinn  
1145 SE Sherrett St  
Portland, OR 97202  
qman714@hotmail.com  
(503) 807-2395

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Jack Duggan \(shanachie@hughes.net\) Sent You a Personal Message](mailto:shanachie@hughes.net)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 10:50:25 AM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

Carbon offsets are a good idea in the right hands. It appears, however, that industry has found ways to continuing their worst polluting ways while claiming carbon offsets in other States. Oregon should restrict any such offsets within the State to State-certified projects that benefit Oregon's fight against climate change.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Jack Duggan  
5505 Forest Creek Rd  
Jacksonville., OR 97530  
shanachie@hughes.net  
(541) 899-7310

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415)

977-5673.

**From:** [Jamie Shields \(jfillmore66@gmail.com\) Sent You a Personal Message](mailto:jfillmore66@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 10:50:26 AM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

Jamie Shields  
15739 NW Rondos Drive  
Portland, OR 97229  
jfillmore66@gmail.com  
(503) 703-0963

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Christine Gillen](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Wednesday, September 20, 2023 10:51:01 AM

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You don't often get email from christinegillen3@advocatefor.me. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Christine Gillen  
1627 NE 120th Ave  
Portland, OR 97220

**From:** [Leslie Pincus \(lpincus@umich.edu\)](mailto:lpincus@umich.edu) Sent You a Personal Message  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 10:52:23 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

If we're lucky, we're still at a tipping point (and not beyond it). Now is the time for real action to stop fossil fuel destruction of an environment that supports human survival.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Leslie Pincus  
7870 SE 13th Ave  
Portland, OR 97202  
lpincus@umich.edu  
(734) 358-6035

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Cornelius Matteo \(cmatteo@nmicorporation.com\) Sent You a Personal Message](mailto:cmatteo@nmicorporation.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 10:52:25 AM

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Sincerely,

Cornelius Matteo  
853 Hillview drive  
Ashland, OR 97520  
cmatteo@nmicorporation.com  
(917) 693-6475

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**From:** [Debbie Lehwalder \(deblehwalder@aol.com\) Sent You a Personal Message](mailto:deblehwalder@aol.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 10:55:13 AM

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Sincerely,

Debbie Lehwalder  
1304 SE Elm Ln  
Grants Pass, OR 97526  
deblehwalder@aol.com  
(541) 226-9813

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**From:** [Tom Beatty \(muddlethruthis@gmail.com\) Sent You a Personal Message](mailto:muddlethruthis@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 10:57:17 AM

---

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Sincerely,

Tom Beatty  
P.O.Box 8555  
Coburg, OR 97408  
[muddlethruthis@gmail.com](mailto:muddlethruthis@gmail.com)  
(541) 345-0410

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Walter Englert \(walter.englert@reed.edu\) Sent You a Personal Message](mailto:walter.englert@reed.edu)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 10:57:44 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

Time is running out for Oregon to play its role in continuing to reduce greenhouse gas emissions. I urge the strongest possible rules that will reduce carbon emissions as quickly as possible.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Walter Englert  
3525 SE Insley St.  
Portland, OR 97202  
walter.englert@reed.edu  
(503) 953-6458

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Lori Koon \(prawns-tram0@icloud.com\) Sent You a Personal Message](mailto:Lori.Koon@prawns-tram0@icloud.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 10:58:05 AM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

I support these amendments.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

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Thank you for the opportunity to provide comments.

Sincerely,

Lori Koon  
336 S 30th Street  
Philomath, OR 97370  
[prawns-tram0@icloud.com](mailto:prawns-tram0@icloud.com)  
(206) 225-7708

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [William M. Musser IV \(wmusseriv@icloud.com\) Sent You a Personal Message](mailto:wmusseriv@icloud.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 10:58:20 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

William M. Musser IV  
3225 NE 29th Ave  
Portland, OR 97212  
wmusseriv@icloud.com  
(303) 549-0938

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Jennifer Will \(jennifer@hdfixer.com\) Sent You a Personal Message](mailto:jennifer@hdfixer.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 10:58:26 AM

---

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Thank you for the opportunity to provide comments.

Sincerely,

Jennifer Will  
21730 Eastmont Drive  
Bend, OR 97701  
jennifer@hdfixer.com  
(408) 705-3217

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Susan Weatherby \(sueweatherby78@gmail.com\) Sent You a Personal Message](mailto:sueweatherby78@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 10:58:59 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

What's the use of limitations and regulations if they are not enforced?

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking, if done well, will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Susan Weatherby  
23 SE 9th St  
Madras, OR 97741  
[sueweatherby78@gmail.com](mailto:sueweatherby78@gmail.com)  
(541) 475-1881

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Jess DePew \(weathernut92@gmail.com\) Sent You a Personal Message](mailto:weathernut92@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 11:01:27 AM

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Thank you for the opportunity to provide comments.

Sincerely,

Jess DePew  
38464 Harrington Dr  
Lebanon, OR 97355  
[weathernut92@gmail.com](mailto:weathernut92@gmail.com)  
(541) 409-0562

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Tracy Richards \(misstracyr@yahoo.com\) Sent You a Personal Message](mailto:Tracy.Richards@sierraclub.org)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 11:03:02 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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Sincerely,

Tracy Richards  
13900 SE Hwy 212 Unit 175  
Clackamas, OR 97015  
misstracyr@yahoo.com  
(971) 204-7139

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Betty Massoni \(massoni@peak.org\) Sent You a Personal Message](mailto:massoni@peak.org)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 11:04:56 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

Climate change is a crisis and we need to respond in all the ways possible to make changes that benefit our communities while adding to efforts to protect the climate. We must act now in both large and small ways.

To whom it may concern,

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Thank you for the opportunity to provide comments.

Sincerely,

Betty Massoni  
1411 NE Granger Ave.  
Corvallis, OR 97330  
massoni@peak.org  
(541) 745-5460

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Drew Barowicz \(dbarowicz@gmail.com\) Sent You a Personal Message](mailto:dbarowicz@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 11:07:03 AM

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Thank you for the opportunity to provide comments.

Sincerely,

Drew Barowicz  
601 NE 74th Ave  
Portland, OR 97213  
dbarowicz@gmail.com  
(206) 548-2123

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Adama Hamilton \(eshyouhod@me.com\) Sent You a Personal Message](mailto:eshyouhod@me.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 11:07:08 AM

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Sincerely,

Adama Hamilton  
113 4TH ST  
Ashland, OR 97520  
eshyouhod@me.com  
(541) 622-4044

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Tracy Hartse](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Wednesday, September 20, 2023 11:11:43 AM

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You don't often get email from rat444tar@advocacymessages.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Tracy Hartse  
610 NW 18th Ave  
Portland, OR 97209

**From:** [Joel Kay \(jjkof1@msn.com\)](mailto:jjkof1@msn.com) Sent You a Personal Message  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 11:12:19 AM

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I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Joel Kay  
10707 SE Stanley Ave  
Milwaukie, OR 97222  
jjkof1@msn.com  
(503) 654-5567

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Stephen Bachhuber \(ornate.data\\_0k@icloud.com\) Sent You a Personal Message](mailto:Stephen.Bachhuber@icloud.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 11:12:30 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

Make rules that really reduce carbon pollution, close loopholes.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
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Thank you for the opportunity to provide comments.

Sincerely,

Stephen Bachhuber  
3428 SE 9th Ave  
Portland, OR 97202  
[ornate.data\\_0k@icloud.com](mailto:ornate.data_0k@icloud.com)  
(503) 319-3950

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Melanie Mock \(melanieelizamock@yahoo.com\) Sent You a Personal Message](mailto:melanieelizamock@yahoo.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 11:13:07 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

When will we start thinking about the world we leave our children and theirs, instead of short term profits for influential parties??

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Melanie Mock  
910 Glendower St.  
Ashland, OR 97520  
[melanieelizamock@yahoo.com](mailto:melanieelizamock@yahoo.com)  
(541) 488-6045

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Beth Levin \(levin.beth@gmail.com\) Sent You a Personal Message](mailto:levin.beth@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 11:14:36 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Beth Levin  
3043 ne 51  
Portland, OR 97213  
levin.beth@gmail.com  
(503) 309-2658

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Sandy Thompson \(bsand@bendbroadband.com\) Sent You a Personal Message](mailto:bsand@bendbroadband.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 11:14:44 AM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Sandy Thompson  
1940 NW Monterey Pines Dr, Unit 1  
Bend, OR 97703  
bsand@bendbroadband.com  
(541) 639-7993

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Steve Sheehy \(sheehy.s@charter.net\) Sent You a Personal Message](mailto:Steve.Sheehy@charter.net)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 11:18:17 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Steve Sheehy  
4727 Alpine Dr.  
Klamath Falls, OR 97603  
sheehy.s@charter.net  
(541) 555-5555

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Craig Emerick \(cemerick5@comcast.net\) Sent You a Personal Message](mailto:cemerick5@comcast.net)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 11:19:41 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Craig Emerick  
221 NW 9th St  
Corvallis, OR 97330  
cemerick5@comcast.net  
(541) 753-5273

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Drew Simrin \(marioman3@gmail.com\) Sent You a Personal Message](mailto:marioman3@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 11:19:43 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

We need to be accurately measuring the pollution and work to reduce it to stop/slow climate chaos and negative effects to communities.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Drew Simrin  
104 Maynard Avenue  
Eugene, OR 97404  
marioman3@gmail.com  
(541) 791-6630

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [lorraine foster \(lorraine.rae.foster@gmail.com\) Sent You a Personal Message](mailto:lorraine.rae.foster@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 11:20:01 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

DEQ, please close loopholes which allow polluters to pay to pollute.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

lorraine foster  
8205 se 9th ave  
Portland, OR 97202  
[lorraine.rae.foster@gmail.com](mailto:lorraine.rae.foster@gmail.com)  
(503) 233-4464

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Greg Destro \(gregdes52@gmail.com\) Sent You a Personal Message](mailto:gregdes52@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 11:20:19 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

Exceptions for polluters is like giving a gun to a criminal!

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Greg Destro  
1223 S 9th St.  
Independence, OR 97351  
gregdes52@gmail.com  
(541) 368-8686

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Linda Skonberg \(lskonberg@mac.com\) Sent You a Personal Message](mailto:lskonberg@mac.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 11:20:44 AM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

You must not let big business get away with sabotaging the rules. They must be made to pay just like the rest of us. Climate change affects us all!

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Linda Skonberg  
564 Wildcat Canyon Rd  
Sutherlin, OR 97479  
lskonberg@mac.com  
(541) 430-9165

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Patricia Oldham \(patroldham@yahoo.com\) Sent You a Personal Message](mailto:patroldham@yahoo.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 11:21:40 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

Time is running out for my granddaughters. There is no reason for any loopholes or exceptions to strict rules. We don't have any more seconds chances.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

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- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Patricia Oldham  
4334 SW Cullen Blvd  
Portland, OR 97221  
patroldham@yahoo.com  
(503) 245-2777

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Gina M Bellucci Yeo \(gina.bellucci.yeo@gmail.com\) Sent You a Personal Message](mailto:gina.bellucci.yeo@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 11:23:31 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

It's time to make our stand and fight to curb climate change and mitigate what we can't change. I want to take responsibility for my actions, and give our youth hope as they face an uncertain future. Thank you for your time and effort.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Gina M Bellucci Yeo  
15832 Highway 36  
Deadwood, OR 97430  
[gina.bellucci.yeo@gmail.com](mailto:gina.bellucci.yeo@gmail.com)  
(541) 964-5833

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415)

977-5673.

**From:** [Clyde Williams \(ccw2crl@gmail.com\)](mailto:ccw2crl@gmail.com) Sent You a Personal Message  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 11:24:38 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Clyde Williams  
7672 SE Roots Rd  
Oak Grove, OR 97267  
ccw2crl@gmail.com  
(503) 314-9558

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Lori Kuebler \(lorinm1966@yahoo.com\) Sent You a Personal Message](mailto:lorinm1966@yahoo.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 11:26:06 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Lori Kuebler  
490 SE OAKBRIAR AVE  
ROSEBURG, OR 97470  
lorinm1966@yahoo.com  
(541) 670-8075

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Mary Thiel \(mjthiel1090@gmail.com\) Sent You a Personal Message](mailto:mjthiel1090@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 11:27:05 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Mary Thiel  
6816 SE 86th Ave  
Portland, OR 97266  
[mjthiel1090@gmail.com](mailto:mjthiel1090@gmail.com)  
(951) 288-8256

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Robert Jessen \(jessen1ri@gmail.com\) Sent You a Personal Message](mailto:jessen1ri@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 11:27:15 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

NO MORE LOOP HOLES. ROBERT and IRENE JESSEN

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Robert Jessen  
6402 Harlan dr  
Klamath Falls, OR 97603  
jessen1ri@gmail.com  
(541) 273-8596

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Stephen Cutler \(snjcutler@gmail.com\) Sent You a Personal Message](mailto:snjcutler@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 11:27:42 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

Stephen Cutler  
469 Aqua Vista Loop  
Yachats, OR 97498  
snjcutler@gmail.com  
(541) 547-3278

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Patty Gifford \(patriciagifford@me.com\) Sent You a Personal Message](mailto:patriciagifford@me.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 11:28:52 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

No pay to pollute loopholes. We need to cleanup what we've got and the polluters can pay for cleaning up what they they have left behind.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Patty Gifford  
4265 NW 192nd Ave.  
Portland, OR 97229  
patriciagifford@me.com  
(503) 735-5138

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Diane Newell Meyer \(meyer.dn42@gmail.com\) Sent You a Personal Message](mailto:meyer.dn42@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 11:30:18 AM

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Thank you for the opportunity to provide comments.

Sincerely,

Diane Newell Meyer  
190 Lincoln St  
Ashland, OR 97520  
[meyer.dn42@gmail.com](mailto:meyer.dn42@gmail.com)  
(541) 488-2646

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Michael Golden \(glowball222@outlook.com\) Sent You a Personal Message](mailto:Michael.Golden@glowball222.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 11:30:34 AM

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Thank you for the opportunity to provide comments.

Sincerely,

Michael Golden  
777 Missouri Flat Rd  
Grants Pass, OR 97527  
[glowball222@outlook.com](mailto:glowball222@outlook.com)  
(541) 441-1118

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Zed Langston \(zedlangston@gmail.com\) Sent You a Personal Message](mailto:zedlangston@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 11:32:46 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

Zed Langston  
4000 Jessen Dr.  
Eugene, OR 97402  
[zedlangston@gmail.com](mailto:zedlangston@gmail.com)  
(541) 913-1424

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Gary Millhollen \(gmillhol@fhsu.edu\) Sent You a Personal Message](mailto:gmillhol@fhsu.edu)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 11:35:30 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

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- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

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Thank you for the opportunity to provide comments.

Sincerely,

Gary Millhollen  
2685 Benson Ln  
Eugene, OR 97408  
gmillhol@fhsu.edu  
(541) 343-0890

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Jennifer Loomis \(jloomis75@yahoo.com\) Sent You a Personal Message](mailto:jloomis75@yahoo.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 11:39:18 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Jennifer Loomis  
7327 SE 87th Ave  
Portland, OR 97266  
jloomis75@yahoo.com  
(503) 317-3902

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Connor Amundsen-Kuester \(camundsenkuester@gmail.com\) Sent You a Personal Message](mailto:camundsenkuester@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 11:40:02 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Connor Amundsen-Kuester  
1985 SE Crystal Cir  
Corvallis, OR 97333  
camundsenkuester@gmail.com  
(541) 905-4988

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Paul Swain \(pcnbswain@msn.com\) Sent You a Personal Message](mailto:pcnbswain@msn.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 11:43:55 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Paul Swain  
5001 NE 36th Ave  
Portland, OR 97211  
pcnbswain@msn.com  
(503) 679-8610

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Maureen O'Neal \(momoneal77@gmail.com\) Sent You a Personal Message](mailto:momoneal77@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 11:49:10 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Maureen O'Neal  
9100 s.w. 80th ave.,  
Tigard, OR 97223  
momoneal77@gmail.com  
(503) 901-7354

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Susanna Askins \(tlknkr@gmail.com\) Sent You a Personal Message](mailto:tlknkr@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 11:49:51 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Susanna Askins  
1108 10th St SE  
Bandon, OR 97411  
tlknkr@gmail.com  
(503) 936-2162

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Tori Herbst \(bother-rashes.0n@icloud.com\) Sent You a Personal Message](mailto:bother-rashes.0n@icloud.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 11:50:43 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

Tori Herbst  
7571 SW Aloma Way, Apt 4  
Portland, OR 97223  
bother-rashes.0n@icloud.com  
(458) 836-8517

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Heather Dale \(arydonis@hotmail.com\) Sent You a Personal Message](mailto:arydonis@hotmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 11:51:39 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

Heather Dale  
26761 SW 45th Dr  
Wilsonville, OR 97070  
arydonis@hotmail.com  
(503) 682-7217

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Natashja Dewolf \(natashjadewolf@yahoo.ca\) Sent You a Personal Message](mailto:natashjadewolf@yahoo.ca)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 11:52:47 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Natashja Dewolf  
258 A Street, Suite 1#52  
Ashland, OR 97520  
natashjadewolf@yahoo.ca  
(541) 555-1212

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Monty Knudsen \(mddlknudsen@gmail.com\) Sent You a Personal Message](mailto:mddlknudsen@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 11:53:58 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Monty Knudsen  
14930 SW Hickory Lane  
Beaverton, OR 97007  
[mddlknudsen@gmail.com](mailto:mddlknudsen@gmail.com)  
(503) 896-9520

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Mary Lyda \(cere7email@gmail.com\) Sent You a Personal Message](mailto:cere7email@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 11:54:34 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

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I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Mary Lyda  
495 Glendon Rd. #558  
Kerby, OR 97531  
[cere7email@gmail.com](mailto:cere7email@gmail.com)  
(541) 415-0767

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Dave King](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Wednesday, September 20, 2023 11:55:58 AM

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You don't often get email from [davewaveking@advocatesmessage.com](mailto:davewaveking@advocatesmessage.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Dave King  
8716 N Edison St  
Portland, OR 97203

**From:** [Judy Kinsman \(judykinsman2@aol.com\) Sent You a Personal Message](mailto:judykinsman2@aol.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 11:56:46 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Judy Kinsman  
1651 Upas St  
Florence, OR 97439  
judykinsman2@aol.com  
(512) 786-3621

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Alan Winter \(alanyehudah@gmail.com\) Sent You a Personal Message](mailto:alanyehudah@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 12:03:40 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

Time to close the loopholes! Plz do your job protecting us? and yourself.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Alan Winter  
5707 NE 15th  
Portland, OR 97211  
[alanyehudah@gmail.com](mailto:alanyehudah@gmail.com)  
(503) 287-8737

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Diana Pace \(pacedf@gmail.com\) Sent You a Personal Message](mailto:pacedf@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 12:13:19 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

Don't let out of state actors pollute Oregon, causing harm to our citizens and environment. Diana

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Diana Pace  
3310 NE Douglas Ave  
Roseburg, OR 97470  
[pacedf@gmail.com](mailto:pacedf@gmail.com)  
(541) 784-5004

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Joel Hurd \(joelwhurd@comcast.net\) Sent You a Personal Message](mailto:joelwhurd@comcast.net)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 12:13:29 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

The rapid onset of global warming NEEDS to be taken seriously. Now!

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Joel Hurd  
2104 Willamette View Ct  
West Linn, OR 97068  
joelwhurd@comcast.net  
(503) 557-7881

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Tammy Bittler \(tammers.jammers@gmail.com\) Sent You a Personal Message](mailto:tammers.jammers@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 12:15:15 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

I live in a home that has been in our family for over 60 years. This year is the 1st year our cistern has ever run dry. It is also gotten so hot, that even on the coast, we have had to add a heat pump to remain cool. We have also seen beloved trees die from the high temperatures. The creek beds are dry and we are seeing more deer coming on the property looking for water. Loopholes that allow the fossil fuel industry to continue to pollute and contribute to this climate crisis should not be on the table. We need viable strategies that will lead us to renewable, clean energy, and the DEQ plays a key role in getting us there.

To whom it may concern,

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Thank you for the opportunity to provide comments.

Sincerely,

Tammy Bittler  
2148 Highway 20  
Newport, OR 97365  
tammers.jammers@gmail.com  
(503) 833-2055

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Joan Oconnor \(oconnorjoan61@gmail.com\) Sent You a Personal Message](mailto:oconnorjoan61@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 12:15:54 PM

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Thank you for the opportunity to provide comments.

Sincerely,

Joan Oconnor  
731 SW Salmon Street  
Portland, OR 97205  
oconnorjoan61@gmail.com  
(608) 606-0645

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Nancy Hiser \(nancyhiser@comcast.net\) Sent You a Personal Message](mailto:nancyhiser@comcast.net)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 12:17:45 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

Nancy Hiser  
10470 NW 2nd St  
Portland, OR 97231  
nancyhiser@comcast.net  
(503) 477-8899

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Arica Duhrkoop-Galas \(arica\\_d@hotmail.com\) Sent You a Personal Message](mailto:arica_d@hotmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 12:18:02 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

As a landscape architect, in my 20 years of practice I have witnessed firsthand how quickly climate impacts are changing plant communities and human communities alike. This is urgent and the time is now!

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Arica Duhrkoop-Galas  
210 Crest Dr.  
Eugene, OR 97405  
arica\_d@hotmail.com  
(541) 686-0797

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Adriana Voss-Andreae \(vossandreae@gmail.com\) Sent You a Personal Message](mailto:vossandreae@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 12:23:10 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

Please do your job to truly stop these false solutions that harm vulnerable communities and our state.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Adriana Voss-Andreae  
1517 SE Holly st  
Portland, OR 97214  
vossandreae@gmail.com  
(503) 331-2309

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Barbara Hazen \(bhazen@efn.org\) Sent You a Personal Message](mailto:bhazen@efn.org)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 12:23:24 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Barbara Hazen  
50 W 36th Ave  
Eugene, OR 97405  
bhazen@efn.org  
(541) 343-9195

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Martin Robbins \(microbbins72@gmail.com\) Sent You a Personal Message](mailto:microbbins72@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 12:25:38 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Martin Robbins  
36373 River Point Drive  
Astoria, OR 97103  
microbbins72@gmail.com  
(541) 961-2775

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Mark and Susan Rochester \(mrock@q.com\) Sent You a Personal Message](mailto:mrock@q.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 12:27:36 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

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Thank you for the opportunity to provide comments.

Sincerely,

Mark and Susan Rochester  
PO Box 736  
Sutherlin, OR 97479  
mrock@q.com  
(541) 459-9479

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Carrie McGranahan \(chicocarriemc@gmail.com\) Sent You a Personal Message](mailto:chicocarriemc@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 12:30:30 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Carrie McGranahan  
225 E 36th Ave  
Eugene, OR 97405  
[chicocarriemc@gmail.com](mailto:chicocarriemc@gmail.com)  
(541) 505-7866

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Carolyn Eckel \(tlew4002@earthlink.net\) Sent You a Personal Message](mailto:tlew4002@earthlink.net)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 12:31:26 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

We need protection from fossil fuel pollution.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Carolyn Eckel  
18542 NE Wasco  
Portland, OR 97230  
tlew4002@earthlink.net  
(503) 251-5939

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Ned Knight \(nknight@linfield.edu\) Sent You a Personal Message](mailto:nknight@linfield.edu)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 12:37:45 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

Offsets do nothing to reduce pollution levels!

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Ned Knight  
2307 E Kennedy Dr  
Newberg, OR 97132  
nknight@linfield.edu  
(503) 883-2567

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Marie Wakefield \(wakefieldm\\_2000@yahoo.com\) Sent You a Personal Message](mailto:wakefieldm_2000@yahoo.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 12:45:24 PM

---

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Thank you for the opportunity to provide comments.

Sincerely,

Marie Wakefield  
3054 Highway 20  
Newport, OR 97365  
wakefieldm\_2000@yahoo.com  
(541) 264-8082

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Jessica Shershun \(shershie7@gmail.com\) Sent You a Personal Message](mailto:shershie7@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 12:45:46 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

Jessica Shershun  
1195 N Elliott Street  
Coquille, OR 97423  
shershie7@gmail.com  
(503) 706-3380

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Ted Lapage \(lapaget@peak.org\) Sent You a Personal Message](mailto:lapaget@peak.org)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 12:46:16 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

Ted Lapage  
2026 NW Lance Way  
Corvallis, OR 97330  
lapaget@peak.org  
(541) 754-6139

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Eileen Sherry \(slueth2u@gmail.com\)](mailto:slueth2u@gmail.com) Sent You a Personal Message  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 12:49:15 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Eileen Sherry  
546 Sunwood Drive NW  
Salem, OR 97304  
slueth2u@gmail.com  
(714) 396-6615

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Ted LaPage \(lapaget@peak.org\) Sent You a Personal Message](mailto:lapaget@peak.org)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 12:50:37 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

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- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
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I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Ted LaPage  
2026 NW Lance Way  
Ted, OR 97330  
lapaget@peak.org  
(541) 754-6139

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Jack Depue \(facilitator09@gmail.com\) Sent You a Personal Message](mailto:facilitator09@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 12:50:43 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

Step up for the planet and all its inhabitants!

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Jack Depue  
8238 SE 11th Avenue  
Portland, OR 97202  
facilitator09@gmail.com  
(503) 358-3750

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Anthony Albert \(albert2910@msn.com\) Sent You a Personal Message](mailto:albert2910@msn.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 1:00:48 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Anthony Albert  
285 NW 35th St  
Corvallis, OR 97330  
albert2910@msn.com  
(541) 753-2910

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Mary Lynn Willis Parodi \(mlwp1@comcast.net\) Sent You a Personal Message](mailto:mlwp1@comcast.net)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 1:01:41 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Mary Lynn Willis Parodi  
12045 SW Springwood Dr.  
Tigard, OR 97223  
mlwp1@comcast.net  
(503) 524-3497

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Florence Harrod \(f.harrod@spectrum.net\) Sent You a Personal Message](mailto:f.harrod@spectrum.net)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 1:02:12 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Florence Harrod  
6080 Mercer Lake Rd  
Florence, OR 97439  
f.harrod@spectrum.net  
(760) 212-0335

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Matthew Smith \(matthew.smith.c@gmail.com\) Sent You a Personal Message](mailto:matthew.smith.c@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 1:02:27 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

Enough with their loopholes !

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Matthew Smith  
8524 Ne Thompson St  
Portland, OR 97220  
matthew.smith.c@gmail.com  
(503) 406-1465

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Georgeanne Samuelson \(bgsamuelson@gmail.com\)](mailto:bgsamuelson@gmail.com) Sent You a Personal Message  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 1:08:37 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

Georgeanne Samuelson  
47525 Perkins St  
Oakridge, OR 97463  
[bgsamuelson@gmail.com](mailto:bgsamuelson@gmail.com)  
(541) 782-1156

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Robert Smith \(tofindbob@hotmail.com\) Sent You a Personal Message](mailto:tofindbob@hotmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 1:09:50 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

Robert Smith  
po box 583  
Clackamas, OR 97015  
tofindbob@hotmail.com  
(503) 593-7840

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Gary Ivey \(grusboy@yahoo.com\) Sent You a Personal Message](mailto:Gary Ivey (grusboy@yahoo.com) Sent You a Personal Message)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 1:09:51 PM

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Thank you for the opportunity to provide comments.

Sincerely,

Gary Ivey  
1350 SE Minam Avenue  
Bend, OR 97702  
grusboy@yahoo.com  
(541) 383-2033

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Corliss A Carleton \(redgiraffe2@comcast.net\) Sent You a Personal Message](mailto:Corliss A Carleton (redgiraffe2@comcast.net) Sent You a Personal Message)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 1:23:13 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

Please do not allow big corporations and utilities to use their resources to bypass real climate control change by "paying to pollute." by substituting their profits for actual changes in processes of production..

To whom it may concern,

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Thank you for the opportunity to provide comments.

Sincerely,

Corliss A Carleton  
10106 SW Erie Court  
Tualatin, OR 97062  
redgiraffe2@comcast.net  
(503) 939-9737

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Jim Hemmingsen \(hemming@cyber-dyne.com\) Sent You a Personal Message](mailto:hemming@cyber-dyne.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 1:23:52 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

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Sincerely,

Jim Hemmingsen  
1860 Riverview St  
Eugene, OR 97403  
[hemming@cyber-dyne.com](mailto:hemming@cyber-dyne.com)  
(541) 345-2449

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Andreas Moran \(andreas.moran@comcast.net\) Sent You a Personal Message](mailto:andreas.moran@comcast.net)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 1:26:43 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

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- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
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I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Andreas Moran  
7440 SW Gordona Crt  
Tigard, OR 97223  
[andreas.moran@comcast.net](mailto:andreas.moran@comcast.net)  
(503) 452-2510

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Bill Gilmore \(bill@bsgilmore.com\) Sent You a Personal Message](mailto:bill@bsgilmore.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 1:28:45 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

Bill Gilmore  
2702 NW Cannon Way  
Portland, OR 97229  
bill@bsgilmore.com  
(503) 350-2350

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Alton Roundy \(lynneroundy2@yahoo.com\) Sent You a Personal Message](mailto:lynneroundy2@yahoo.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 1:31:34 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Alton Roundy  
38438 SE Kitzmiller Rd  
Eagle Creek, OR 97022  
lynneroundy2@yahoo.com  
(503) 637-3066

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Herb Everett \(perose@earthlink.net\)](mailto:perose@earthlink.net) Sent You a Personal Message  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 1:31:57 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

Please get serious right now about reducing carbon emissions in our state.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Herb Everett  
2155 Monroe St  
Eugene, OR 97405  
[perose@earthlink.net](mailto:perose@earthlink.net)  
(541) 345-0709

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Jane Bartosz \(janemir@msn.com\) Sent You a Personal Message](mailto:janemir@msn.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 1:33:22 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

We must reach climate goals in order to protect lives and our earth.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Jane Bartosz  
1125 Genie Ct  
Salem, OR 97306  
janemir@msn.com  
(503) 391-8848

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Lynette Meadows \(lynette.lost@gmail.com\) Sent You a Personal Message](mailto:lynette.lost@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 1:42:32 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

Lynette Meadows  
4630 NE Skidmore St  
Portland, OR 97218  
lynette.lost@gmail.com  
(503) 636-0054

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Diana Cunningham \(dianacunningham62@gmail.com\) Sent You a Personal Message](mailto:dianacunningham62@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 1:47:32 PM

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Thank you for the opportunity to provide comments.

Sincerely,

Diana Cunningham  
1467 Siskiyou Blvd  
Ashland, OR 97520  
dianacunningham62@gmail.com  
(831) 295-7565

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Scott Kennedy \(tykieh@comcast.net\) Sent You a Personal Message](mailto:tykieh@comcast.net)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 1:48:56 PM

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Sincerely,

Scott Kennedy  
6027 Sir Lancelot Ct NE  
Keizer, OR 97303  
tykieh@comcast.net  
(503) 507-3178

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Donald Tull \(dontull63@yahoo.com\) Sent You a Personal Message](mailto:dontull63@yahoo.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 1:51:14 PM

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Sincerely,

Donald Tull  
4425 W Main St. SPC 9  
Medford, OR 97501  
dontull63@yahoo.com  
(541) 690-6362

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Sean Leslie \(sean14leslie@gmail.com\) Sent You a Personal Message](mailto:sean14leslie@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 1:54:37 PM

---

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Thank you for the opportunity to provide comments.

Sincerely,

Sean Leslie  
3045 NW Craftsman Drive  
Bend, OR 97703  
sean14leslie@gmail.com  
(603) 661-0051

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Rena Philbrook](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Wednesday, September 20, 2023 2:06:53 PM

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You don't often get email from [renablacketer12@yourconstituent.com](mailto:renablacketer12@yourconstituent.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Rena Philbrook  
4657 NE Johns Ave  
Neotsu, OR 97364

**From:** [Cathy Bledsoe \(clbledsoe44@gmail.com\) Sent You a Personal Message](mailto:clbledsoe44@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 2:14:07 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Cathy Bledsoe  
10151 SW Washington St.  
Portland, OR 97225  
[clbledsoe44@gmail.com](mailto:clbledsoe44@gmail.com)  
(503) 297-5987

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Michael E. Peterson Peterson \(wmmakers@comcast.net\) Sent You a Personal Message](mailto:wmmakers@comcast.net)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 2:21:58 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

Michael E. Peterson Peterson  
1621 Escalante St  
Eugene, OR 97404  
wmmakers@comcast.net  
(541) 689-6148

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Ann Hollyfield \(hollyhast@peak.org\)](mailto:hollyhast@peak.org) Sent You a Personal Message  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 2:36:01 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

Ann Hollyfield  
Box 999  
Waldport, OR 97394  
[hollyhast@peak.org](mailto:hollyhast@peak.org)  
(541) 563-3376

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Karen Gerdes](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Climate Protection Plan  
**Date:** Wednesday, September 20, 2023 2:40:02 PM

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[You don't often get email from karengerdes@comcast.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

DEQ:

Let me register my hope that you will do the right thing for Portland, its citizens, and, well, the planet by doing everything you can to keep the CPP strong and effective.

Karen Gerdes  
Portland, OR 97222

**From:** [NORMAN LEWIS \(norm\\_lewis@comcast.net\) Sent You a Personal Message](mailto:norm_lewis@comcast.net)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 2:47:56 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

NORMAN LEWIS  
3876 Monroe St  
Eugene, OR 97405  
norm\_lewis@comcast.net  
(541) 342-7387

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Guy Hallman \(guyhallman@hotmail.com\) Sent You a Personal Message](mailto:guyhallman@hotmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 2:49:24 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

Guy Hallman  
4305 Harlan Dr NE  
Salem, OR 97305  
guyhallman@hotmail.com  
(626) 791-3113

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Ruba Leech \(ruba\\_t@hotmail.com\) Sent You a Personal Message](mailto:ruba_t@hotmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 2:53:14 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Ruba Leech  
1128 Ne Emerson  
Portland, OR 97211  
[ruba\\_t@hotmail.com](mailto:ruba_t@hotmail.com)  
(203) 308-3966

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Mike Flaningam \(mikeflanny@hotmail.com\) Sent You a Personal Message](mailto:mikeflanny@hotmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 2:54:04 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

Mike Flaningam  
115 SW Gull Station  
Depoe Bay, OR 97341  
mikeflanny@hotmail.com  
(916) 712-3603

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Linda and John Mackown \(jlmackown@casco.net\) Sent You a Personal Message](mailto:jlmackown@casco.net)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 2:56:24 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

Linda and John Mackown  
77 SE Yaquina View Dr.  
Newport, OR 97365  
jlmackown@casco.net  
(541) 265-3245

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Harry Freiberg \(hap@alumni.stanford.edu\) Sent You a Personal Message](mailto:hap@alumni.stanford.edu)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 2:58:03 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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Sincerely,

Harry Freiberg  
610 Mardon Ct.  
Brookings, OR 97415  
[hap@alumni.stanford.edu](mailto:hap@alumni.stanford.edu)  
(541) 469-8979

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [John McSwigan \(recoil-hackle.Oj@icloud.com\) Sent You a Personal Message](mailto:John McSwigan (recoil-hackle.Oj@icloud.com) Sent You a Personal Message)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 3:00:52 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

John McSwigan  
6358 NE Rosebay Dr  
Hillsboro, OR 97124  
recoil-hackle.Oj@icloud.com  
(503) 887-7653

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Chuck Hottle \(cehottle@hotmail.com\) Sent You a Personal Message](mailto:cehottle@hotmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 3:04:52 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

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Thank you for the opportunity to provide comments.

Sincerely,

Chuck Hottle  
604 ne galloway  
McMinnville, OR 97128  
cehottle@hotmail.com  
(503) 853-0126

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Terry Partipilo \(srptlp@gmail.com\) Sent You a Personal Message](mailto:srptlp@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 3:14:18 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

Terry Partipilo  
3198 Livingston St NE  
Salem, OR 97301  
srptlp@gmail.com  
(503) 931-7092

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Jeanne Brooks \(ms.jeanbrooks@gmail.com\)](mailto:ms.jeanbrooks@gmail.com) Sent You a Personal Message  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 3:20:52 PM

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Thank you for the opportunity to provide comments.

Sincerely,

Jeanne Brooks  
17232 Ivy Ln  
Sisters, OR 97759  
[ms.jeanbrooks@gmail.com](mailto:ms.jeanbrooks@gmail.com)  
(541) 382-3115

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Robert Thornhill \(robertthornhill14@yahoo.com\) Sent You a Personal Message](mailto:robertthornhill14@yahoo.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 3:25:35 PM

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Thank you for the opportunity to provide comments.

Sincerely,

Robert Thornhill  
13586 SE Nightingale Ave  
Happy Valley, OR 97015  
robertthornhill14@yahoo.com  
(323) 270-2022

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Marty Brockway \(beentaken59@gmail.com\)](mailto:beentaken59@gmail.com) Sent You a Personal Message  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 3:32:37 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

Marty Brockway  
4341, S.W.Hume ST.  
Portland, OR 97280  
[beentaken59@gmail.com](mailto:beentaken59@gmail.com)  
(503) 953-5255

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Teresa Himelhoch \(trsokol@yahoo.com\) Sent You a Personal Message](mailto:trsokol@yahoo.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 3:36:51 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

Teresa Himelhoch  
4155 Ne Three Mile Lane, Sp 1  
Mcminnville, OR 97128  
trsokol@yahoo.com  
(971) 832-3119

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [DL Chipman](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Wednesday, September 20, 2023 3:40:05 PM

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You don't often get email from [albanydog@advocatefor.me](mailto:albanydog@advocatefor.me). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
DL Chipman  
PO Box 9  
Siletz, OR 97380

**From:** [Martin Frazier \(martinfrazier52@gmail.com\) Sent You a Personal Message](mailto:martinfrazier52@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 4:07:49 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

**POLLUTORS MUST STOP. DEQ AND EPA MUST PROSECUTE THEM.**

To whom it may concern,

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Thank you for the opportunity to provide comments.

Sincerely,

Martin Frazier  
6315 SE 18TH AVENUE  
Portland, OR 97202  
martinfrazier52@gmail.com  
(503) 233-5638

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Roger Knudson \(rogerknudson@gmail.com\) Sent You a Personal Message](mailto:rogerknudson@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 4:14:01 PM

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Thank you for the opportunity to provide comments.

Sincerely,

Roger Knudson  
3842 Brighton Avenue  
Eugene, OR 97405  
rogerknudson@gmail.com  
(859) 866-3962

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**From:** [David Taylor \(glacierrefer@yahoo.com\) Sent You a Personal Message](mailto:glacierrefer@yahoo.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 4:20:31 PM

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Sincerely,

David Taylor  
P.O. Box 108  
Corvallis, OR 97339  
glacierrefer@yahoo.com  
(541) 757-1514

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Linda Hendrix \(bendher63@gmail.com\) Sent You a Personal Message](mailto:bendher63@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 4:37:13 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Linda Hendrix  
104 SE Airpark Dr.  
Bend, OR 97702  
[bendher63@gmail.com](mailto:bendher63@gmail.com)  
(541) 382-5337

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** Valerie Snyder <campaigns@good.do>  
**Sent:** Wednesday, September 20, 2023 4:44 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18-month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system; and
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Valerie Snyder

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This email was sent by Valerie Snyder via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic

no-reply address at campaigns@good.do, however Valerie provided an email address (mvensnyder@yahoo.com) which we included in the REPLY-TO field.

Please reply to Valerie Snyder at mvensnyder@yahoo.com.

To learn more about Do Gooder visit

<https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.dogooder.co%2F&data=05%7C01%7CClimate.2023%40stateoforegon.mail.onmicrosoft.com%7C7425e49f0fb847a9948208dbba336fb0%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C638308502299844767%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6I1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=dOqX9kczLoImXxMysAyMxctmuF7w1alyA5j%2BiAB1qw%3D&reserved=0>

To learn more about web protocol RFC 3834 visit:

<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Ftools.ietf.org%2Fhtml%2Frfc3834&data=05%7C01%7CClimate.2023%40stateoforegon.mail.onmicrosoft.com%7C7425e49f0fb847a9948208dbba336fb0%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C638308502299844767%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6I1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=nWqTTTb3Az%2F16PAsXJ2LxGoPkGd77v%2Bx7DixF36S%2BsM%3D&reserved=0>

**From:** [Marilee Corey \(handicrafts22@yahoo.com\) Sent You a Personal Message](mailto:handicrafts22@yahoo.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 4:45:52 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

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I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Marilee Corey  
5200 Pettyjohn Rd S  
Salem, OR 97302  
handicrafts22@yahoo.com  
(503) 884-6858

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Cherine Bauer \(cherinel@comcast.net\) Sent You a Personal Message](mailto:cherinel@comcast.net)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 4:48:28 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

Cherine Bauer  
85 River Loop 1  
Eugene, OR 97404  
cherinel@comcast.net  
(541) 688-2065

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Phil Goldsmith \(phil@lopplaw.com\) Sent You a Personal Message](mailto:phil@lopplaw.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 4:54:54 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Phil Goldsmith  
3110 NW 112th Place  
Portland, OR 97229  
[phil@lopplaw.com](mailto:phil@lopplaw.com)  
(503) 545-9904

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**From:** [Jeanne Seay](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Wednesday, September 20, 2023 5:04:36 PM

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You don't often get email from [seay.jeanne@advocatefor.me](mailto:seay.jeanne@advocatefor.me). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Jeanne Seay  
84017 Brown Rd  
Dexter, OR 97431

**From:** [Francisco Gadea \(frankie0004260@gmail.com\) Sent You a Personal Message](mailto:frankie0004260@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 5:14:01 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

Francisco Gadea  
3519 NE 15th Ave #166  
Portland, OR 97212  
frankie0004260@gmail.com  
(503) 880-7031

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Jean Buelna-Pastor \(keck\\_buelna@hotmail.com\) Sent You a Personal Message](mailto:keck_buelna@hotmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 5:36:24 PM

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Thank you for the opportunity to provide comments.

Sincerely,

Jean Buelna-Pastor  
17497 SW 104th Ave  
Tualatin, OR 97062  
keck\_buelna@hotmail.com  
(503) 784-1457

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Ann Nowicki \(tazzannie975@gmail.com\)](mailto:tazzannie975@gmail.com) Sent You a Personal Message  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 5:50:29 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Ann Nowicki  
3355 N Delta Hwy Unit 170, Eugene, OR 97408, Unit 170  
Eugene, OR 97408  
[tazzannie975@gmail.com](mailto:tazzannie975@gmail.com)  
(719) 671-3240

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Gregory Ellsworth \(ellsworth2359@comcast.net\) Sent You a Personal Message](mailto:ellsworth2359@comcast.net)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 5:58:22 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Gregory Ellsworth  
7770 SW 66th Ave.  
Portland, OR 97223  
ellsworth2359@comcast.net  
(971) 563-5654

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Marshall Hill-Tanquist \(mhilltanquist@gmail.com\) Sent You a Personal Message](mailto:mhilltanquist@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 6:05:26 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

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I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Marshall Hill-Tanquist  
1894 NW Lance Way  
Corvallis, OR 97330  
mhilltanquist@gmail.com  
(541) 754-4106

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Ange Crawford \(crawford@peak.org\) Sent You a Personal Message](mailto:crawford@peak.org)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 6:07:41 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

Offsets in other states do nothing to protect Oregonians. Polluters need to conform to OR laws (CPP). Heat, wildfires, floods, air and water pollution are putting people at risk! You don't need MORE \$\$ ? you need MORE integrity!

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Ange Crawford  
2820 nw royal oaks dr  
Corvallis, OR 97330  
crawford@peak.org  
(541) 752-2172

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415)

977-5673.

**From:** [Bonnie Desaulnier \(bonniedesaulnier@gmail.com\)](mailto:bonniedesaulnier@gmail.com) Sent You a Personal Message  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 6:18:21 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

Paying to pollute without implementation of renewables simply doesn't work.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Bonnie Desaulnier  
895 W 22nd Ave  
Eugene, OR 97405  
[bonniedesaulnier@gmail.com](mailto:bonniedesaulnier@gmail.com)  
(541) 337-6082

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Ian Williams \(kingscupchamps2012@gmail.com\)](mailto:kingscupchamps2012@gmail.com) Sent You a Personal Message  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 6:35:45 PM

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Thank you for the opportunity to provide comments.

Sincerely,

Ian Williams  
380 West Buford Ave  
Siletz, OR 97380  
[kingscupchamps2012@gmail.com](mailto:kingscupchamps2012@gmail.com)  
(987) 654-3210

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Jessica Vaughan](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Wednesday, September 20, 2023 6:41:20 PM

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You don't often get email from [jessicajvaughan@gmail.com](mailto:jessicajvaughan@gmail.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

However, I was disappointed to hear that the recent rule-making table did not include community input, and also that the results lacked in meeting the plan's original goals of reducing greenhouse gas emissions by 50%, providing meaningful investments to benefit Oregonians, and holding big polluters accountable.

Therefore, I am calling on the DEQ to adapt the rules for CPP implementation to focus on the original goals of:

- 1) Reducing greenhouse gas emissions and other air pollutants, maximizing public health benefits, and minimizing costs for consumers in environmental justice and other communities in Oregon.
- 2) Keeping economic and health benefits of the Community Climate Investment program in Oregon: investments should materially benefit Oregonians at the frontlines of pollution and the climate crisis, rather than paying for cheap offsets in other places.
- 3) Achieving real reduction of emissions by 50%, rather than allowing companies to invest in biomass-derived fuels such as "renewable natural gas" (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
- 4) Holding big polluters accountable to engage in science-based "best available emissions reductions" (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.
- 5) Returning the date for a "new source" of stationary pollution to December 31, 2021.

The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

OR

Sincerely,  
Jessica Vaughan  
3704 N Kerby Ave  
Portland, OR 97227

**From:** [Marney Reed \(marneyr08@gmail.com\) Sent You a Personal Message](mailto:marneyr08@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 6:56:03 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
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I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Marney Reed  
508 Robin LN  
Florence, OR 97439  
marneyr08@gmail.com  
(541) 234-5678

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Ruth Duvaille Duvaille \(ruthaduvaille@gmail.com\) Sent You a Personal Message](mailto:ruthaduvaille@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 7:01:30 PM

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Thank you for the opportunity to provide comments.

Sincerely,

Ruth Duvaille Duvaille  
7701 Forest Magic Ct  
Live Oak, TX 97015  
ruthaduvaille@gmail.com  
(775) 223-2052

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Kyla Yeoman](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Wednesday, September 20, 2023 7:04:31 PM

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You don't often get email from [kyla.r.yeoman@gmail.com](mailto:kyla.r.yeoman@gmail.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

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- 5) Returning the date for a "new source" of stationary pollution to December 31, 2021.

The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
Kyla Yeoman  
3020 NE 29th Ave  
Portland, OR 97212

**From:** [Terry Sawyer \(tlsawyer@drizzle.com\) Sent You a Personal Message](mailto:tlsawyer@drizzle.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 7:20:56 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

Terry Sawyer  
7445 Jubil Ln SE  
SALEM, OR 97317  
tlsawyer@drizzle.com  
(503) 364-3620

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Jules Moritz \(mazda63@comcast.net\) Sent You a Personal Message](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 7:31:30 PM

---

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Thank you for the opportunity to provide comments.

Sincerely,

Jules Moritz  
8285 NW Mitchell Drive  
Corvallis, OR 97330  
mazda63@comcast.net  
(541) 754-0405

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Ken Kebisek \(kenkebisek@frontier.com\) Sent You a Personal Message](mailto:kenkebisek@frontier.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 7:33:54 PM

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Thank you for the opportunity to provide comments.

Sincerely,

Ken Kebisek  
10986 SW Washington St  
Portland, OR 97225  
kenkebisek@frontier.com  
(503) 641-4010

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [james miller \(jandhmiller@comcast.net\)](mailto:jandhmiller@comcast.net) Sent You a Personal Message  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 7:40:49 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

james miller  
2866 heron loop albany or  
albany, OR 97322  
jandhmiller@comcast.net  
(541) 812-1531

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Johanna Hand](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Wednesday, September 20, 2023 7:45:47 PM

---

You don't often get email from johannahandaz@gmail.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

However, I was disappointed to hear that the recent rule-making table did not include community input, and also that the results lacked in meeting the plan's original goals of reducing greenhouse gas emissions by 50%, providing meaningful investments to benefit Oregonians, and holding big polluters accountable.

Therefore, I am calling on the DEQ to adapt the rules for CPP implementation to focus on the original goals of:

- 1) Reducing greenhouse gas emissions and other air pollutants, maximizing public health benefits, and minimizing costs for consumers in environmental justice and other communities in Oregon.
- 2) Keeping economic and health benefits of the Community Climate Investment program in Oregon: investments should materially benefit Oregonians at the frontlines of pollution and the climate crisis, rather than paying for cheap offsets in other places.
- 3) Achieving real reduction of emissions by 50%, rather than allowing companies to invest in biomass-derived fuels such as "renewable natural gas" (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
- 4) Holding big polluters accountable to engage in science-based "best available emissions reductions" (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.
- 5) Returning the date for a "new source" of stationary pollution to December 31, 2021.

The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
Johanna Hand  
4637 NE Cleveland Ave  
Portland, OR 97211

**From:** [Scotty Johnson \(stjohns83@hotmail.com\) Sent You a Personal Message](mailto:stjohns83@hotmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 7:55:48 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

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However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

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I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Scotty Johnson  
3939 S BOND AVE APT 504  
Portland, OR 97239  
stjohns83@hotmail.com  
(972) 849-4172

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Esther Friedman \(ibclprof@comcast.net\) Sent You a Personal Message](mailto:ibclprof@comcast.net)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 8:04:39 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

Esther Friedman  
4160 Hertel Dr S.,  
Salem, OR 97302  
ibclprof@comcast.net  
(503) 881-1715

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Mari Hahn](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Wednesday, September 20, 2023 8:07:44 PM

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You don't often get email from marijhahn@gmail.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

However, I was disappointed to hear that the recent rule-making table did not include community input, and also that the results lacked in meeting the plan's original goals of reducing greenhouse gas emissions by 50%, providing meaningful investments to benefit Oregonians, and holding big polluters accountable.

Therefore, I am calling on the DEQ to adapt the rules for CPP implementation to focus on the original goals of:

- 1) Reducing greenhouse gas emissions and other air pollutants, maximizing public health benefits, and minimizing costs for consumers in environmental justice and other communities in Oregon.
- 2) Keeping economic and health benefits of the Community Climate Investment program in Oregon: investments should materially benefit Oregonians at the frontlines of pollution and the climate crisis, rather than paying for cheap offsets in other places.
- 3) Achieving real reduction of emissions by 50%, rather than allowing companies to invest in biomass-derived fuels such as "renewable natural gas" (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
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- 5) Returning the date for a "new source" of stationary pollution to December 31, 2021.

The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
Mari Hahn  
6624 SE 36th Ave  
Portland, OR 97202

**From:** [Elizabeth Olson](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Preserve the original Climate Protection Plan!  
**Date:** Wednesday, September 20, 2023 8:08:09 PM

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You don't often get email from revlizolson@gmail.com. [Learn why this is important](#)

To the members of the DEQ Climate Protection Plan rule-making committee,

As a rural Oregonian who had previously expressed my encouragement to the DEQ to develop the Climate Protection Plan, I am outraged and frustrated that the rule-making process is being co-opted largely by representatives of energy corporations who are manipulating the plan to serve the profit interests of the fossil energy industry!

I urge you to ignore the efforts of the gas utilities to bypass the Community Climate Investment (CCI) fund by incorporating out-of-state Renewable Natural gas into their product and evading the CCI focus on promoting social justice in Oregon. We need the Best Available Emissions Reduction rules to keep industry on a steep downward trajectory in emissions. Lastly, if we are to move forward with the use of hydrogen, that we do so only using hydrogen produced through electrolysis using renewable energy.

I encourage you to think and act from a place of moral conviction, from what you know in your heart to be the right thing to do.

Thank you,  
Rev. Elizabeth L. Olson  
Talent, OR 97540

**From:** [Cynthia Marrs \(marrs\\_cynthia@yahoo.com\) Sent You a Personal Message](mailto:marrs_cynthia@yahoo.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 8:30:50 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Cynthia Marrs  
94224 Templeton Rd  
Junction City, OR 97448  
marrs\_cynthia@yahoo.com  
(541) 998-6343

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Linda Donnelly \(ngdonnelly@comcast.net\) Sent You a Personal Message](mailto:ngdonnelly@comcast.net)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 8:35:35 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

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As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Linda Donnelly  
1109 Church St NE  
Salem, OR 97301  
[ngdonnelly@comcast.net](mailto:ngdonnelly@comcast.net)  
(503) 581-2616

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Gerry Keener \(gerrkeen@gmail.com\) Sent You a Personal Message](mailto:gerrkeen@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 8:35:49 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Gerry Keener  
1034 Custer Ct  
Eugene, OR 97404  
gerrkeen@gmail.com  
(541) 688-3868

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Jaime Ramirez \(yunohuayam@yahoo.com\) Sent You a Personal Message](mailto:yunohuayam@yahoo.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 8:58:11 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Jaime Ramirez  
1213 Jackson Street  
Corvallis, OR 97330  
yunohuayam@yahoo.com  
(541) 758-3259

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Lida Stevenson \(lida.durant@gmail.com\) Sent You a Personal Message](mailto:lida.durant@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 9:13:17 PM

---

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Thank you for the opportunity to provide comments.

Sincerely,

Lida Stevenson  
1610 SW Martin St  
Corvallis, OR 97333  
[lida.durant@gmail.com](mailto:lida.durant@gmail.com)  
(541) 228-2948

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Elizabeth Olson](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Preserve the original Climate Protection Plan!  
**Date:** Wednesday, September 20, 2023 8:08:09 PM

---

You don't often get email from revlizolson@gmail.com. [Learn why this is important](#)

To the members of the DEQ Climate Protection Plan rule-making committee,

As a rural Oregonian who had previously expressed my encouragement to the DEQ to develop the Climate Protection Plan, I am outraged and frustrated that the rule-making process is being co-opted largely by representatives of energy corporations who are manipulating the plan to serve the profit interests of the fossil energy industry!

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I encourage you to think and act from a place of moral conviction, from what you know in your heart to be the right thing to do.

Thank you,  
Rev. Elizabeth L. Olson  
Talent, OR 97540

**From:** [Cynthia Marrs \(marrs\\_cynthia@yahoo.com\) Sent You a Personal Message](mailto:marrs_cynthia@yahoo.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 8:30:50 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

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- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
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I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Cynthia Marrs  
94224 Templeton Rd  
Junction City, OR 97448  
marrs\_cynthia@yahoo.com  
(541) 998-6343

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Linda Donnelly \(ngdonnelly@comcast.net\) Sent You a Personal Message](mailto:ngdonnelly@comcast.net)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 8:35:35 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Linda Donnelly  
1109 Church St NE  
Salem, OR 97301  
[ngdonnelly@comcast.net](mailto:ngdonnelly@comcast.net)  
(503) 581-2616

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Gerry Keener \(gerrkeen@gmail.com\) Sent You a Personal Message](mailto:gerrkeen@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 8:35:49 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

Gerry Keener  
1034 Custer Ct  
Eugene, OR 97404  
gerrkeen@gmail.com  
(541) 688-3868

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Jaime Ramirez \(yunohuayam@yahoo.com\) Sent You a Personal Message](mailto:yunohuayam@yahoo.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 8:58:11 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

Jaime Ramirez  
1213 Jackson Street  
Corvallis, OR 97330  
yunohuayam@yahoo.com  
(541) 758-3259

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Lida Stevenson \(lida.durant@gmail.com\) Sent You a Personal Message](mailto:lida.durant@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 9:13:17 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

Lida Stevenson  
1610 SW Martin St  
Corvallis, OR 97333  
[lida.durant@gmail.com](mailto:lida.durant@gmail.com)  
(541) 228-2948

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Julaine Morley \(rayjmo@charter.net\) Sent You a Personal Message](mailto:rayjmo@charter.net)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 9:13:31 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

Julaine Morley  
183 Ocean Wayside Ln, PO Box 788  
YACHATS, OR 97498  
rayjmo@charter.net  
(458) 546-9012

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Charlie Graham \(cgraham@teleport.com\) Sent You a Personal Message](mailto:cgraham@teleport.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 9:17:02 PM

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Thank you for the opportunity to provide comments.

Sincerely,

Charlie Graham  
695 NE 4th Ave.  
Hillsboro, OR 97124  
cgraham@teleport.com  
(503) 679-4444

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Mickey Munoz \(pickeymickey@gmail.com\) Sent You a Personal Message](mailto:pickeymickey@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 9:19:18 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

Mickey Munoz  
PO Box 2698  
Grants Pass, OR 97528  
[pickeymickey@gmail.com](mailto:pickeymickey@gmail.com)  
(541) 295-8536

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Margaret Wehrley](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Wednesday, September 20, 2023 9:31:18 PM

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You don't often get email from wehrleym55@advocatefor.me. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Margaret Wehrley  
2816 NW Kennedy Ct  
Portland, OR 97229

**From:** [Dorothy Benson](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Wednesday, September 20, 2023 9:55:55 PM

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You don't often get email from dorben3295@yourconstituent.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Dorothy Benson  
3295 Onyx St  
Eugene, OR 97405

**From:** [Deb D'Andrea \(debs-email@comcast.net\) Sent You a Personal Message](mailto:debs-email@comcast.net)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 9:57:50 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

We don't have time for this nonsense. Stop the pollution! Stop the free ride these people have been getting. Make them pay through the nose for what they've already done and stop letting them do more!

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Deb D'Andrea  
14775 NW Satellite Dr  
Banks, OR 97106  
debs-email@comcast.net  
(503) 324-0311

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Virginia Tarango \(mazvirtar@gmail.com\) Sent You a Personal Message](mailto:mazvirtar@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 10:37:42 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

Don't allow companies to pay to pollute. We need to ensure we move forward in reducing climate chaos emissions.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Virginia Tarango  
2311 se 34th Ave  
Portland, OR 97214  
mazvirtar@gmail.com  
(503) 997-0828

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Karen Horton \(onlyjustbegun40s@gmail.com\) Sent You a Personal Message](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 10:43:24 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

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Thank you for the opportunity to provide comments.

Sincerely,

Karen Horton  
4311 Independence Highway  
Independence, OR 97351  
onlyjustbegun40s@gmail.com  
(971) 218-4572

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Greg Steinke \(gsteinke9@gmail.com\) Sent You a Personal Message](mailto:gsteinke9@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, September 20, 2023 11:07:25 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

Greg Steinke  
445 SW Spindrift  
Depoe Bay, OR 97341  
gsteinke9@gmail.com  
(541) 418-1182

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [onai aziz](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Wednesday, September 20, 2023 11:48:29 PM

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You don't often get email from [onaiaziz1@advocatesmessage.com](mailto:onaiaziz1@advocatesmessage.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
onai aziz  
2934 SE Alder St  
Portland, OR 97214

**From:** [Rachel Bartow](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Thursday, September 21, 2023 12:24:57 AM

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You don't often get email from [rachelbartow20@foradvocacy.com](mailto:rachelbartow20@foradvocacy.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

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Regards,  
Rachel Bartow  
1395 Poplar Dr  
Medford, OR 97504

**From:** [Nancy Fleming \(nflemingrn@aol.com\) Sent You a Personal Message](mailto:nflemingrn@aol.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, September 21, 2023 3:01:28 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

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Thank you for the opportunity to provide comments.

Sincerely,

Nancy Fleming  
943 Lake Front Rd  
Lake Oswego, OR 97034  
nflemingrn@aol.com  
(971) 335-3900

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [James Neu \(jjneusies2@gmail.com\) Sent You a Personal Message](mailto:jjneusies2@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, September 21, 2023 5:56:13 AM

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Thank you for the opportunity to provide comments.

Sincerely,

James Neu  
3072 Webster St  
Eugene, OR 97404  
[jjneusies2@gmail.com](mailto:jjneusies2@gmail.com)  
(925) 228-0639

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Stacy Alaimo \(salaimo@uoregon.edu\) Sent You a Personal Message](mailto:salaimo@uoregon.edu)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, September 21, 2023 6:16:51 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

Stacy Alaimo  
220 Azalea Drive  
Eugene, OR 97404  
salaimo@uoregon.edu  
(469) 865-3176

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Vickie Mcalister \(antiserf@hotmail.com\) Sent You a Personal Message](mailto:antiserf@hotmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, September 21, 2023 6:34:06 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

Vickie Mcalister  
1965 Inland Way  
Springfield, OR 97477  
antiserf@hotmail.com  
(541) 603-5166

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Marlene Olveda \(marleneolveda@yahoo.com\) Sent You a Personal Message](mailto:marleneolveda@yahoo.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, September 21, 2023 6:43:10 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Marlene Olveda  
3713 N Michigan Ave  
Portland, OR 97227  
marleneolveda@yahoo.com  
(503) 319-4172

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [William Hamilton](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Thursday, September 21, 2023 6:46:07 AM

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You don't often get email from [williamhamilton712@sendgrassroots.com](mailto:williamhamilton712@sendgrassroots.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
William Hamilton  
8346 SW Apple Way Apt V201  
Portland, OR 97225

**From:** [Lee Schondorf \(adventure\\_kayak@yahoo.com\) Sent You a Personal Message](mailto:Lee.Schondorf@adventure_kayak@yahoo.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, September 21, 2023 6:59:42 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

1. TODAY most rural areas burn their garbage. 2. 100+ million vehicles emit terrible pollution because they've never been tuned up in 10 to 40 years. 3. Many states have no vehicle pollution check (even if only every 5 years would be sufficient). I personally know this because daily I run into 500 vehicles i can see smoking and can smell the pollution. 3. One home with a wood stove in my city makes the entire city smell like campfire smoke and we can see the smoke. Multiply that times millions of wood stoves in USA. But i'm WOKE!

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Lee Schondorf  
678 Charles Street  
Yoncalla, OR 97499  
adventure\_kayak@yahoo.com  
(541) 849-2181

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Gregory Monahan \(gregorymonahan29@gmail.com\) Sent You a Personal Message](mailto:gregorymonahan29@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, September 21, 2023 7:35:34 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

No out of state offsets!

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Gregory Monahan  
11125 SE 21st Ave Apt 328  
Milwaukie, OR 97222  
gregorymonahan29@gmail.com  
(503) 314-9647

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Ellen Pfander \(ellpfa@gmail.com\)](mailto:ellpfa@gmail.com) Sent You a Personal Message  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, September 21, 2023 7:48:25 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Ellen Pfander  
83435 Tolman Rd  
Creswell, OR 97426  
ellpfa@gmail.com  
(541) 895-3403

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Stephanie Strakbein \(sastrakbein@gmail.com\) Sent You a Personal Message](mailto:sastrakbein@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, September 21, 2023 8:10:51 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

Stephanie Strakbein  
2723 NW 22nd St  
Redmond, OR 97756  
sastrakbein@gmail.com  
(480) 291-4071

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [ardith Blank \(ardithhb@frontier.com\) Sent You a Personal Message](mailto:ardithhb@frontier.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, September 21, 2023 8:18:02 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

ardith Blank  
14260 sw 114th ave  
Tigard, OR 97224  
ardithhb@frontier.com  
(503) 620-1765

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Sandra Elliott \(madamsandra@hotmail.com\) Sent You a Personal Message](mailto:madamsandra@hotmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, September 21, 2023 8:19:45 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

Sandra Elliott  
7714 sw barnes rd  
Portland, OR 97225  
madamsandra@hotmail.com  
(503) 292-1384

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Sarah Medley \(sarah.medley3@gmail.com\) Sent You a Personal Message](mailto:sarah.medley3@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, September 21, 2023 8:42:11 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

Sarah Medley  
730 NW 20th Ave 102  
Portland, OR 97209  
sarah.medley3@gmail.com  
(971) 413-3920

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Drew F. F. \(andrew.fletcher3@gmail.com\) Sent You a Personal Message](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, September 21, 2023 8:59:51 AM

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Thank you for the opportunity to provide comments.

Sincerely,

Drew F. F.  
1505 S Comus  
Portland, OR 97219  
andrew.fletcher3@gmail.com  
(503) 804-5599

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Jesse Burke-Quinn \(jesseq70@gmail.com\)](mailto:jesseq70@gmail.com) Sent You a Personal Message  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, September 21, 2023 9:14:56 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Jesse Burke-Quinn  
811 Yeust rd  
Azalea, OR 97429  
[jesseq70@gmail.com](mailto:jesseq70@gmail.com)  
(541) 670-9501

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Rochelle Zirdum](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Thursday, September 21, 2023 10:14:33 AM

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You don't often get email from rochelle@foradvocacy.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Rochelle Zirdum  
1942 SE 74th Ave  
Hillsboro, OR 97123

**From:** [Marceline Gearry \(marcelineg@gmail.com\) Sent You a Personal Message](mailto:marcelineg@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, September 21, 2023 11:10:30 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Marceline Gearry  
2884 NW Savier St, Portland OR 97210  
Portland, OR 97210  
marcelineg@gmail.com  
(503) 223-4366

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Sommer Yesenofski](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Thursday, September 21, 2023 11:59:16 AM

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You don't often get email from syesenof@p2a.co. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

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**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Sommer Yesenofski  
10663 SE 37th Ave  
Milwaukie, OR 97222

**From:** [Dana Weintraub \(mrdanaweintraub@tutanota.com\)](mailto:mrdanaweintraub@tutanota.com) Sent You a Personal Message  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, September 21, 2023 12:39:06 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
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I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Dana Weintraub  
17124 SW Marty Ln  
Beaverton, OR 97003  
mrdanaweintraub@tutanota.com  
(503) 591-9470

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**From:** [Kim Davis \(k.mdavis@yahoo.com\) Sent You a Personal Message](mailto:k.mdavis@yahoo.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, September 21, 2023 1:13:53 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

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Thank you for the opportunity to provide comments.

Sincerely,

Kim Davis  
5455 oakridge ct se  
Salem, OR 97306  
k.mdavis@yahoo.com  
(971) 237-5459

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Jordan Foster](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Thursday, September 21, 2023 1:14:46 PM

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You don't often get email from jefoster36@advocatesmessage.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Jordan Foster  
350 Khyber Ct SE  
Salem, OR 97306

**From:** [Corie Harlan](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Thursday, September 21, 2023 1:17:44 PM

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You don't often get email from corieharlan@p2a.co. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

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**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Corie Harlan  
148 SE Craven Rd  
Bend, OR 97702

**From:** [Jennifer Kain](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Thursday, September 21, 2023 2:56:22 PM

---

You don't often get email from [jchokain@gmail.com](mailto:jchokain@gmail.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

However, I was disappointed to hear that the recent rule-making table did not include community input, and also that the results lacked in meeting the plan's original goals of reducing greenhouse gas emissions by 50%, providing meaningful investments to benefit Oregonians, and holding big polluters accountable.

Therefore, I am calling on the DEQ to adapt the rules for CPP implementation to focus on the original goals of:

- 1) Reducing greenhouse gas emissions and other air pollutants, maximizing public health benefits, and minimizing costs for consumers in environmental justice and other communities in Oregon.
- 2) Keeping economic and health benefits of the Community Climate Investment program in Oregon: investments should materially benefit Oregonians at the frontlines of pollution and the climate crisis, rather than paying for cheap offsets in other places.
- 3) Achieving real reduction of emissions by 50%, rather than allowing companies to invest in biomass-derived fuels such as "renewable natural gas" (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
- 4) Holding big polluters accountable to engage in science-based "best available emissions reductions" (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.
- 5) Returning the date for a "new source" of stationary pollution to December 31, 2021.

The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

These changes are critical to effective implementation of a climate plan and reducing emissions. Thank you for your consideration.

Sincerely,  
Jennifer Kain  
95 SW 101st Ave  
Portland, OR 97225

**From:** [Susan Eisman](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Thursday, September 21, 2023 2:56:25 PM

---

You don't often get email from susieeisman@yahoo.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

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Therefore, I am calling on the DEQ to adapt the rules for CPP implementation to focus on the original goals of:

- 1) Reducing greenhouse gas emissions and other air pollutants, maximizing public health benefits, and minimizing costs for consumers in environmental justice and other communities in Oregon.
- 2) Keeping economic and health benefits of the Community Climate Investment program in Oregon: investments should materially benefit Oregonians at the frontlines of pollution and the climate crisis, rather than paying for cheap offsets in other places.
- 3) Achieving real reduction of emissions by 50%, rather than allowing companies to invest in biomass-derived fuels such as "renewable natural gas" (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
- 4) Holding big polluters accountable to engage in science-based "best available emissions reductions" (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.
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The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
Susan Eisman  
3367 SE Franklin St  
Portland, OR 97202

**From:** [Alice West](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Thursday, September 21, 2023 2:56:27 PM

---

You don't often get email from agentsassysquirrel@hotmail.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

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- 1) Reducing greenhouse gas emissions and other air pollutants, maximizing public health benefits, and minimizing costs for consumers in environmental justice and other communities in Oregon.
- 2) Keeping economic and health benefits of the Community Climate Investment program in Oregon: investments should materially benefit Oregonians at the frontlines of pollution and the climate crisis, rather than paying for cheap offsets in other places.
- 3) Achieving real reduction of emissions by 50%, rather than allowing companies to invest in biomass-derived fuels such as "renewable natural gas" (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
- 4) Holding big polluters accountable to engage in science-based "best available emissions reductions" (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.
- 5) Returning the date for a "new source" of stationary pollution to December 31, 2021.

The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
Alice West  
1237 SE 53rd Ave  
Portland, OR 97215

**From:** William O'Brien <campaigns@good.do>  
**Sent:** Thursday, September 21, 2023 3:14 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18-month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system; and
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
William O'Brien

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no-reply address at campaigns@good.do, however William provided an email address (wobobr123@gmail.com) which we included in the REPLY-TO field.

Please reply to William O'Brien at wobobr123@gmail.com.

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**From:** Pamela Doran <campaigns@good.do>  
**Sent:** Thursday, September 21, 2023 3:20 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18-month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

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- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Pamela Doran

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no-reply address at campaigns@good.do, however Pamela provided an email address (pamshores@msn.com) which we included in the REPLY-TO field.

Please reply to Pamela Doran at pamshores@msn.com.

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**From:** Jess Kimball <campaigns@good.do>  
**Sent:** Thursday, September 21, 2023 3:25 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

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By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system; and
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits— ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Jess Kimball

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no-reply address at campaigns@good.do, however Jess provided an email address (jkimball246@gmail.com) which we included in the REPLY-TO field.

Please reply to Jess Kimball at jkimball246@gmail.com.

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**From:** [Sue Craig \(sueacraig@gmail.com\) Sent You a Personal Message](mailto:sueacraig@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, September 21, 2023 3:43:19 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

Please help US...we the people. You have the power to help bring this climate problem under control. Please use the power to significantly decrease the use of fossil fuels. Thank you. Sue Craig

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Sue Craig  
5229 Glenn Ellen Dr.  
Eugene, OR 97402  
[sueacraig@gmail.com](mailto:sueacraig@gmail.com)  
(541) 607-0204

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**From:** Jennifer Murphy <campaigns@good.do>  
**Sent:** Thursday, September 21, 2023 4:59 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18-month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system; and
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Jennifer Murphy  
Milwaukie, Oregon, 97222, United States

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no-reply address at campaigns@good.do, however Jennifer provided an email address (petitchou77@hotmail.com) which we included in the REPLY-TO field.

Please reply to Jennifer Murphy at petitchou77@hotmail.com.

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**From:** [Yael Warshai](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Thursday, September 21, 2023 5:28:47 PM

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You don't often get email from [yael.warshai@gmail.com](mailto:yael.warshai@gmail.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

However, I was disappointed to hear that the recent rule-making table did not include community input, and also that the results lacked in meeting the plan's original goals of reducing greenhouse gas emissions by 50%, providing meaningful investments to benefit Oregonians, and holding big polluters accountable.

Therefore, I am calling on the DEQ to adapt the rules for CPP implementation to focus on the original goals of:

- 1) Reducing greenhouse gas emissions and other air pollutants, maximizing public health benefits, and minimizing costs for consumers in environmental justice and other communities in Oregon.
- 2) Keeping economic and health benefits of the Community Climate Investment program in Oregon: investments should materially benefit Oregonians at the frontlines of pollution and the climate crisis, rather than paying for cheap offsets in other places.
- 3) Achieving real reduction of emissions by 50%, rather than allowing companies to invest in biomass-derived fuels such as "renewable natural gas" (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
- 4) Holding big polluters accountable to engage in science-based "best available emissions reductions" (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.
- 5) Returning the date for a "new source" of stationary pollution to December 31, 2021.

The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
Yael Warshai  
2014 SE Yamhill St  
Portland, OR 97214

**From:** [Courtney McCoy \(greencheetah@gmail.com\) Sent You a Personal Message](mailto:greencheetah@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, September 21, 2023 6:31:21 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

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Thank you for the opportunity to provide comments.

Sincerely,

Courtney McCoy  
3205 SW Underwood Dr.  
Portland, OR 97225  
[greencheetah@gmail.com](mailto:greencheetah@gmail.com)  
(502) 836-1488

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**From:** Mary Bosch <campaigns@good.do>  
**Sent:** Thursday, September 21, 2023 6:34 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** PLEASE Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

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Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Mary Bosch

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no-reply address at campaigns@good.do, however Mary provided an email address (mpbosch4@gmail.com) which we included in the REPLY-TO field.

Please reply to Mary Bosch at mpbosch4@gmail.com.

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**From:** [Joelyn Salvetti](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Thursday, September 21, 2023 6:35:29 PM

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Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

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**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Joelyn Salvetti  
800 NW 118th Ave Apt 104  
Portland, OR 97229

**From:** [ro.lewis](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Please PROTECT the Oregon Climate Protection Program  
**Date:** Thursday, September 21, 2023 7:17:20 PM

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I am writing to urge you to make rules which do not allow corporations to increase emissions. The Oregon DEQ should return to its original Climate Protection Plan and ignore efforts by the gas utilities to bypass the Community Climate Investment (CCI) fund by incorporating out-of-state Renewable Natural gas into their product. This would evade the CCI focus on promoting social justice in Oregon. The Best Available Emissions Reduction rules keep industry on a steep downward trajectory in emissions, and encourage the position that only hydrogen produced through electrolysis using renewable energy should be acceptable.

I trust you to truly stand up to the big moneyed interests and protect the environmental quality of our beautiful state.

I am a rural Oregonian and I am concerned about the climate crisis. Thank you,  
Rosanne Lewis

**From:** Sheila Greer <campaigns@good.do>  
**Sent:** Thursday, September 21, 2023 8:06 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18-month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system; and
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Sheila Greer  
Damascus, Oregon, 97089, United States

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Please reply to Sheila Greer at spgreer@frontier.com.

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**From:** [Lindsay Jetton](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Friday, September 22, 2023 12:32:00 AM

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Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

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Regards,  
Lindsay Jetton  
PO Box 430  
Williams, OR 97544

**From:** [Angelica Spata](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Friday, September 22, 2023 12:32:13 AM

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Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Angelica Spata  
6195 N Minnesota Ave  
Portland, OR 97217

**From:** [Kaci Doty](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Friday, September 22, 2023 12:32:20 AM

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Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Kaci Doty  
15115 Twin Fir Rd  
Lake Oswego, OR 97035

**From:** [Donnielle O'Neill](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Friday, September 22, 2023 12:32:25 AM

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Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Donnielle O'Neill  
Portland, OR 97214

**From:** [nancy Brown](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Friday, September 22, 2023 2:03:44 AM

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Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
nancy Brown  
6825 SW Princess Ave  
Beaverton, OR 97008

**From:** [Shannon ilacqua](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Friday, September 22, 2023 6:44:58 AM

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Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Shannon ilacqua  
2129 Rogue River Hwy  
Grants Pass, OR 97527

**From:** [SerA Eden](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Friday, September 22, 2023 7:00:32 AM

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Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
SerA Eden  
5624 NE 24th Ave  
Portland, OR 97211

**From:** [Helena Birecki](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Friday, September 22, 2023 8:03:54 AM  
**Attachments:** [Climate Reality Portland testimony re 2023 Climate Rule-Making.pdf](#)

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Dear Environmental Quality Commission and DEQ staff,

Please accept the attached PDF comments on the 2023 Climate Rulemaking on behalf of Climate Reality Project Portland Chapter.

Thank you,

*Helena Birecki, Legislative Committee*

*Nick Keenan, Renewable Energy Committee Chair*

*Climate Reality Project Portland Chapter*

**From:** Alice West <campaigns@good.do>  
**Sent:** Friday, September 22, 2023 8:11 AM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP— a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18-month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system; and
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits— ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Alice West

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This email was sent by Alice West via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic

no-reply address at campaigns@good.do, however Alice provided an email address (agentsassysquirrel@hotmail.com) which we included in the REPLY-TO field.

Please reply to Alice West at agentsassysquirrel@hotmail.com.

To learn more about Do Gooder visit

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To learn more about web protocol RFC 3834 visit:

<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Ftools.ietf.org%2Fhtml%2Frfc3834&data=05%7C01%7CClimate.2023%40stateoforegon.mail.onmicrosoft.com%7Cb3905ee9feb8468a26b808dbbb7e1df6%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C638309922564992313%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Iik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=ZCO%2BepTW%2FmWSkdeND313qQT1WvbtYC1y55H7P4uUffM%3D&reserved=0>

**From:** [Kate Ayres](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Community Energy Project Comments on DEQ Climate Rulemaking 2023  
**Date:** Friday, September 22, 2023 8:43:35 AM  
**Attachments:** [CEP Comments - DEQ Climate Rulemaking.pdf](#)

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You don't often get email from [kate@communityenergyproject.org](mailto:kate@communityenergyproject.org). [Learn why this is important](#)

To the DEQ Climate Rulemaking Committee and Department of Environmental Quality,

Thank you for the opportunity to provide comments on the 2023 DEQ Climate Rulemaking. Below you will see the attached PDF with Community Energy Project's comments.

Please let me know if you have any questions or issues with the document.

Thank you,

--

Kate Ayres  
Policy and Advocacy Manager  
Community Energy Project



2705 E. Burnside, Suite 112  
Portland, OR 97214

[Website](#) | [Twitter](#) | [Facebook](#)  
[she/her]

**From:** [Amanda Perry](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Friday, September 22, 2023 9:01:56 AM

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You don't often get email from [amandalynn214@yourconstituent.com](mailto:amandalynn214@yourconstituent.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

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most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Something needs done immediately no waiting around on this one!

Regards,  
Amanda Perry  
804 Williams Ave  
Tillamook, OR 97141

**From:** [Laura Hanks \(laura.hanks7@gmail.com\)](mailto:laura.hanks7@gmail.com) Sent You a Personal Message  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, September 22, 2023 9:50:44 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Laura Hanks  
6281 SE Deering Ct  
Portland, OR 97222  
[laura.hanks7@gmail.com](mailto:laura.hanks7@gmail.com)  
(503) 305-1744

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Stephen White \(surfwhite@mac.com\) Sent You a Personal Message](mailto:surfwhite@mac.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, September 22, 2023 10:59:24 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

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- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Stephen White  
996 Donaldson Way  
Medford, OR 97501  
surfwhite@mac.com  
(831) 239-6541

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Karen Caudillo](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Please strengthen proposed 2023 Climate Rulemaking  
**Date:** Friday, September 22, 2023 11:05:21 AM  
**Attachments:** [Outlook-j5q4rkj2.png](#)  
[Outlook-qg0jdqbu.png](#)  
[Outlook-152BE9F5.png](#)  
[Outlook-F2C2E4CB.png](#)  
[Outlook-96636411.png](#)  
[Outlook-6A649147.png](#)  
[Outlook-893AD1ED.png](#)

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Department of Environmental Quality,

Thank you for the opportunity to comment on DEQ's 2023 climate rulemaking. This rulemaking will have far-reaching consequences for the climate and communities in Oregon. Especially BIPOC, the working class, and especially the next generation.

My name is Karen Caudillo Roman. Adelante Mujeres is working to build a more just society by empowering Latine Women to lead, for Latine women and their families, generations of poverty, racism, sexism, and isolation have limited opportunities for empowerment. I've worked at Adelante Mujeres for almost two years now. I launched our first Environmental Justice Leadership Program with our first cohort this year with the support of Metro's Community Enhancement Grant. Our community is worried about our environment. We know that we are a part of one of the most impacted groups in the state.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP— a program essential to achieving our state's climate pollution reduction goals and adopted with overwhelming public support following an extensive 18-month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments and expand new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, thereby hindering benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

- Restricting biomethane (aka renewable natural gas (RNG)) used for CPP compliance to that which produces direct benefits for Oregonians – projects that reduce pollution in Oregon.
- Disallowing hydrogen to be used for CPP compliance unless it is green electrolytic hydrogen (made from renewable energy sources like solar and wind). Why? Not all hydrogen is created equally. Where and how it is produced and used matters significantly regarding emissions reduction – if it's produced from fossil fuels out-of-

state, it could be *more* polluting than even natural gas.

- Strengthening emissions reduction requirements for new or expanded large industrial facilities in Oregon under the CPP's Best Available Emissions Reduction (BAER) program.

Doing so will help ensure that Oregon stays on track to achieve our climate goals and maximize the associated job creation, cost-saving, public health, and economic development benefits—ensuring that they benefit Oregon communities and are not exported out of state. Our state should prioritize our communities over special interest groups. Please strengthen the proposed 2023 Climate Rulemaking.

Thank you for the opportunity to provide comments.

In solidarity,

*Leadership and Advocacy Team*



*(Graphic by interwork collective freedom)*



**Karen Caudillo Roman (KAER-ahN)**

Pronouns: She/Ella/they/Elle ([What is this? Click here](#))

Community Organizer, Adelante Mujeres

[Schedule a 30 minute 1:1 with me here!](#)

[www.adelantemujeres.org](http://www.adelantemujeres.org) | [Get Our E-mails!](#)

2030 Main St. Suite A. Forest Grove, OR 97116



Adelante Mujeres values the health and safety of our community. Our office is open to the public and the Adelante team is working in a hybrid way. Masks are required for all visitors to the Early Childhood Education area. Our office requires all visitors to be vaccinated and we accept masks! **We have a "mirror masking" policy which is to wear a mask as a matter of courtesy if someone you interact with is wearing a mask.** If you choose to wear a mask, our team will put yours on and vice versa; If a member of our team wears a mask, we ask that you and all members of your group also wear a mask. Please contact our office prior to your visit at person to inquire about our latest precautions against COVID-19.

We're located in the occupied territories of the Kalapuya, Confederated Tribes of Siletz Indians, Confederated Tribes of Grand Ronde, Atfalati, and many other Indigenous nations, tribes, and bands who made their homes along the confluence of the Columbia and Willamette Rivers. ***By recognizing these communities, we honor their legacies, lives, and descendants, and acknowledge our roles and responsibilities as guests on stolen lands.***

***Take action today. See Ecotrust's [Call to Action here](#).***

**From:** Phil Houston Goldsmith <campaigns@good.do>  
**Sent:** Friday, September 22, 2023 11:16 AM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18-month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

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- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system; and
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Phil Houston Goldsmith  
Portland, Oregon, 97229, United States

---

This email was sent by Phil Houston Goldsmith via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to

our generic no-reply address at campaigns@good.do, however Phil provided an email address (phil@loplaw.com) which we included in the REPLY-TO field.

Please reply to Phil Houston Goldsmith at phil@loplaw.com.

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**From:** [Valerie Snyder \(mvensnyder@yahoo.com\) Sent You a Personal Message](mailto:mvensnyder@yahoo.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, September 22, 2023 11:17:50 AM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Valerie Snyder  
3311 valley crest way  
Forest Grove, OR 97116  
mvensnyder@yahoo.com  
(971) 242-9517

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**From:** [Alicia Liang](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Friday, September 22, 2023 11:23:09 AM

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Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

However, I was disappointed to hear that the recent rule-making table did not include community input, and also that the results lacked in meeting the plan's original goals of reducing greenhouse gas emissions by 50%, providing meaningful investments to benefit Oregonians, and holding big polluters accountable.

Therefore, I am calling on the DEQ to adapt the rules for CPP implementation to focus on the original goals of:

- 1) Reducing greenhouse gas emissions and other air pollutants, maximizing public health benefits, and minimizing costs for consumers in environmental justice and other communities in Oregon.
- 2) Keeping economic and health benefits of the Community Climate Investment program in Oregon: investments should materially benefit Oregonians at the frontlines of pollution and the climate crisis, rather than paying for cheap offsets in other places.
- 3) Achieving real reduction of emissions by 50%, rather than allowing companies to invest in biomass-derived fuels such as "renewable natural gas" (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
- 4) Holding big polluters accountable to engage in science-based "best available emissions reductions" (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.
- 5) Returning the date for a "new source" of stationary pollution to December 31, 2021.

The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
Alicia Liang  
1915 SE 32nd Pl  
Portland, OR 97214

**From:** [Robbin Schindele](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Friday, September 22, 2023 11:24:07 AM

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You don't often get email from [robbinschindele@yourconstituent.com](mailto:robbinschindele@yourconstituent.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Robbin Schindele  
PO Box 342  
Glide, OR 97443

**From:** [Hanna Heddy](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Friday, September 22, 2023 11:27:20 AM

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Hello,

As a resident of Yamhill County, in this beautiful state of Oregon, I believe the rules that the DEQ are proposing for the CPP are missing the following key elements:

- **reducing greenhouse gas emissions** and other air pollutants, **maximizing public health** benefits, and **minimizing costs** for consumers in environmental justice and other communities in Oregon.
- keeping economic and health benefits of the Community Climate Investment program in Oregon: **investments should materially benefit Oregonians** rather than paying for cheap offsets in other places.
- **real reduction of emissions** by 50%, rather than allowing companies to invest in “renewable natural gas” (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
- **holding big polluters accountable** to engage in science-based “best available emissions reductions” (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.

I firmly believe that these original goals are what the CPP should focus on.

Thank you for your time, and for listening today.

Sincerely,  
Hanna Heddy  
Newberg, Oregon

**From:** [David Heddy](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Friday, September 22, 2023 11:29:46 AM

---

You don't often get email from dheddy19@gmail.com. [Learn why this is important](#)

Hello,

As a resident of Yamhill County, in this beautiful state of Oregon, I believe the rules that the DEQ are proposing for the CPP are missing the following key elements:

- **reducing greenhouse gas emissions** and other air pollutants, **maximizing public health** benefits, and **minimizing costs** for consumers in environmental justice and other communities in Oregon.
- keeping economic and health benefits of the Community Climate Investment program in Oregon: **investments should materially benefit Oregonians** rather than paying for cheap offsets in other places.
- **real reduction of emissions** by 50%, rather than allowing companies to invest in “renewable natural gas” (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
- **holding big polluters accountable** to engage in science-based “best available emissions reductions” (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.

I firmly believe that these original goals are what the CPP should focus on.

Thank you for your time, and for listening today.

Sincerely,  
David Heddy  
Newberg, Oregon

**From:** [Susan Dornfeld](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Friday, September 22, 2023 12:27:32 PM

---

You don't often get email from susandornfeld6005@gmail.com. [Learn why this is important](#)

Department of Environmental Quality,

Thank you for the opportunity to provide comments on DEQ's 2023 climate rulemaking.

By designing guidelines for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring that our state stays on track to achieve our climate goals. However, given the broad scope of issues and laws touched by this proceeding, there could be serious unintended consequences if impacts to communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

Restricting biomethane (aka renewable natural gas (RNG)) used for CPP compliance to that which produces direct benefits for Oregonians – projects that reduce pollution in Oregon.

Disallowing hydrogen to be used for CPP compliance unless it is green electrolytic hydrogen (made from renewable energy sources like solar and wind). Why? Not all hydrogen is created equally. Where and how it is produced and used matters significantly when it comes to emissions reduction – if it's produced from fossil fuels out-of-state, it could be *more* polluting than even natural gas.

Strengthening emissions reduction requirements for new or expanded large industrial facilities in Oregon under the CPP's Best Available Emissions Reduction (BAER) program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you again for the opportunity to provide comments.

Susan Dornfeld

**From:** [Carrie Tilton-Jones \(carrie@ology.org\)](mailto:carrie@ology.org) Sent You a Personal Message  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, September 22, 2023 1:00:45 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

My kid has asthma and has been struggling with poor air quality caused by climate change. I take a medication that makes me sensitive to excessive heat caused by climate change. This is not hypothetical or in the future. Climate change caused by polluters is harming my family's health here and now. Please stand up for us.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Carrie Tilton-Jones  
6244 SW Orchid Drive  
Portland, OR 97219  
[carrie@ology.org](mailto:carrie@ology.org)  
(512) 658-2301

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977-5673.

**From:** [Tyson Butler](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Friday, September 22, 2023 2:43:05 PM

---

You don't often get email from butler.tyson@gmail.com. [Learn why this is important](#)

Greetings,

As a parent of three who wants a livable climate in Yamhill County and Oregon, where I live, I believe the rules that the DEQ are proposing for the CPP are missing the following key elements:

- **reducing greenhouse gas emissions** and other air pollutants, **maximizing public health** benefits, and **minimizing costs** for consumers in environmental justice and other communities in Oregon.
- keeping economic and health benefits of the Community Climate Investment program in Oregon: **investments should materially benefit Oregonians** rather than paying for cheap offsets in other places.
- **real reduction of emissions** by 50%, rather than allowing companies to invest in “renewable natural gas” (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
- **holding big polluters accountable** to engage in science-based “best available emissions reductions” (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.

I firmly believe that these original goals are what the CPP should focus on.

Please reflect the will on regular Oregonians on this matter, not special interests.

Sincerely,  
Tyson Butler

**From:** Anna Cowen <campaigns@good.do>  
**Sent:** Friday, September 22, 2023 2:59 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18-month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system; and
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Anna Cowen

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This email was sent by Anna Cowen via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic

no-reply address at campaigns@good.do, however Anna provided an email address (annaysun@yahoo.com) which we included in the REPLY-TO field.

Please reply to Anna Cowen at annaysun@yahoo.com.

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**From:** [John Hamilton](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Climate Protection Program Rules  
**Date:** Friday, September 22, 2023 3:07:01 PM

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You don't often get email from jhamilto@mind.net. [Learn why this is important](#)

Dear Ms/Sir:

I urge ODEQ to return to its original Climate Protection Plan and ignore efforts by the gas utilities to bypass the Community Climate Investment (CCI) fund by incorporating out-of-state Renewable Natural gas into their product and evading the CCI focus on promoting social justice in Oregon,

I insist that the Best Available Emissions Reduction rules keep industry on a steep downward trajectory in emissions.

I urge you to ensure that only hydrogen produced through electrolysis using renewable energy should be acceptable.

Please consider my comments as a rural Oregonian.

Sincerely,

John Hamilton

1217 Park Street, Ashland, OR 97520

(530) 340-2391

**From:** [Peg Johnson](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Friday, September 22, 2023 3:18:39 PM  
**Attachments:** [CAP Comments Sept 2023.pdf](#)

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*Enough is as good as a feast.*

**From:** [Anna Cowen \(annaysun@yahoo.com\) Sent You a Personal Message](mailto:annaysun@yahoo.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, September 22, 2023 3:22:13 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Anna Cowen  
19308 Leland Rd  
Oregon City, OR 97045  
annaysun@yahoo.com  
(503) 865-8406

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**From:** [lauraallen.allenmead.com](mailto:lauraallen.allenmead.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Comments on DEQ rulemaking for CPP  
**Date:** Friday, September 22, 2023 3:48:47 PM

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You don't often get email from [lauraallen@allenmead.com](mailto:lauraallen@allenmead.com). [Learn why this is important](#)

Hello, I am an Oregon resident and offer the following comments on the Climate Protection Program rulemaking recommended by the Advisory Committee. It's very disappointing to know that the agency appointed an Advisory Committee stacked with energy industry representatives rather than folks committed to a rigorous effort to implement the CPP as conceived by the Executive Order 20-04 and recommended by EQC. It's no surprise that the proposed rules by the Committee are clearly calculated to undermine the CPP and the need to protect Oregon's environment and economy in the face of climate change. I urge you to reconsider these proposed rules and redraw them with an eye to a rigorous enforcement of CPP as called for by EQC. You after all are the agency tasked with protecting Oregon's environmental quality and to that end to implement the Executive Order.

I urge you to reject the proposed rules, in particular, where they allow unrestricted offsets from investment in biomethane projects out of state, contrary to the Community Climate Investment fund. This will not reduce emissions in Oregon and will compromise the environmental justice goals of CPP.

There are also no restrictions on how hydrogen is produced. This is a serious concern as it could be worse than the fossil fuel it replaces.

Finally, the Best Available Emissions Reduction rules imposed on large industrial emitters should not permit an industry to increase its emissions by increasing production. This would seriously undermine emissions reduction. Surely you can see that. We need to make real efforts to reduce GHG emissions, and I call on you as DEQ to be zealously committed to that.

Thank you.

Laura Allen  
Seaside, Oregon  
(425) 419-7301

**From:** Laura Rogers <campaigns@good.do>  
**Sent:** Friday, September 22, 2023 4:10 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Critical: Strengthen the proposed 2023 climate rules

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18-month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system; and
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Laura Rogers  
Portland, Oregon, 97202, United States

---

This email was sent by Laura Rogers via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Laura provided an email address (llr4100@yahoo.com) which we included in the REPLY-TO field.

Please reply to Laura Rogers at llr4100@yahoo.com.

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**From:** [Charles Townsend](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Friday, September 22, 2023 4:18:59 PM

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Thank you for the opportunity to provide comment today on DEQ's 2023 climate rulemaking.

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of “book and claim” accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from anthropogenic carbon sources does not comply with the CPP.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported

out of state.

Thank you for the opportunity to provide comments.

**From:** [Amy Whitworth \(gullivereco@comcast.net\) Sent You a Personal Message](mailto:gullivereco@comcast.net)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, September 22, 2023 4:35:17 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Amy Whitworth  
1725 SE 34th Ave  
Portland, OR 97214  
gullivereco@comcast.net  
(503) 239-0105

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**From:** [Danielle Foreman-Smith](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Friday, September 22, 2023 4:52:30 PM

---

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Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Danielle Foreman-Smith  
1300 Quaker St  
Eugene, OR 97402

**From:** [Eric](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Friday, September 22, 2023 4:57:00 PM

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Eric Robinson  
135 East 33rd Ave  
Eugene, OR 97405  
September 22, 2023  
Phone: 541-206-3933

To Whom It May Concern,

I hope this letter finds its way into the hands of those who share my deep commitment to the preservation of Oregon's natural beauty and the fight against climate change.

As a long-time resident of Oregon, I have witnessed firsthand the incredible work undertaken by the Oregon Department of Environmental Quality (DEQ) to protect our state's invaluable environmental resources. Over the years, my perspective on environmental matters has evolved, leading me to recognize the pressing need to address climate change and safeguard our environment for generations to come.

Today, I am writing to express my heartfelt concern regarding DEQ's current proposed rules. It has come to my attention that these rules may inadvertently create opportunities for regulated gas utilities to capitalize on out-of-state biomethane investments, potentially enabling the expansion of new large industrial emitters in Oregon. This prospect deeply troubles me, as it undermines the progress we have made in recent years to reduce our state's carbon footprint and transition to cleaner, more sustainable energy sources.

I implore all those involved to consider the long-term implications of these proposed rules. Striking a balance between economic growth and environmental preservation is of paramount importance. I firmly believe that Oregon has the potential to set an example of how a state can thrive while prioritizing environmental responsibility.

Moreover, it is my sincere hope that we not only maintain but also strengthen the Oregon Climate Protection Program (CPP). This program represents a critical step in our fight against climate change and should be upheld as a cornerstone of our state's commitment to environmental sustainability.

Furthermore, I extend an invitation to potential DEQ employees and state representatives who hold the power to influence legislative decisions on this matter. Oregon presents a unique opportunity to contribute to meaningful change and lead the way in environmental stewardship. By joining our efforts, you can be part of a movement that not only protects our environment but also creates a sustainable future for our state's residents.

In conclusion, I urge all stakeholders to reconsider the proposed rules and ensure they align with our shared commitment to combating climate change, preserving Oregon's natural beauty, and strengthening the Oregon Climate Protection Program. I remain hopeful that, collectively, we can discover innovative solutions that benefit both our environment and our economy.

Thank you for your attention to this matter, and I look forward to a future where Oregon continues to shine as a beacon of environmental responsibility.

Sincerely,

Eric Robinson  
Phone: 541-206-3933

Sent from my iPhone

**From:** [Robert Albee \(purelyog@gmail.com\) Sent You a Personal Message](mailto:Robert.Albee@purelyog@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, September 22, 2023 6:18:15 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Robert Albee  
651 east intervale road  
Grants Pass, OR 97527  
purelyog@gmail.com  
(541) 415-0435

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**From:** [robin\\_riseup](mailto:robin_riseup)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Friday, September 22, 2023 6:49:52 PM

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Subject: 2023 Climate Rulemaking

To DEQ,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking.

I have concerns that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

As the only existing state regulation on major industrial emitters, it is vital that the CPP works to ensure science-based emissions reductions from existing stationary sources and deter development of new stationary sources in Oregon, and this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

Please strengthen the proposed 2023 climate rules.

Sincerely,

Robin Bloomgarden  
3690 Wood ave  
Eugene, OR 97402  
541-688-1820

**From:** George Stevenson <campaigns@good.do>  
**Sent:** Friday, September 22, 2023 9:05 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18-month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

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- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system; and
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
George Stevenson  
Portland, Oregon, 97230, United States

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Please reply to George Stevenson at monateemon@hotmail.com.

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**From:** [Heidi Gerson \(heidigerson@yahoo.com\) Sent You a Personal Message](mailto:heidigerson@yahoo.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, September 22, 2023 9:46:03 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

Please hold industry accountable for their polluting. We have no excuse for letting them pollute our lands.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

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I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Heidi Gerson  
5335 Main St, Spc 196  
Springfield, OR 97478  
heidigerson@yahoo.com  
(541) 914-6155

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**From:** [Carl Shoemaker](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Friday, September 22, 2023 11:20:27 PM

---

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Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Carl Shoemaker  
312 NE 5th St  
Bend, OR 97701

**From:** [David Klingensmith \(davidk9385@msn.com\) Sent You a Personal Message](mailto:davidk9385@msn.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Saturday, September 23, 2023 1:01:19 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

David Klingensmith  
655 Good Pasture Island Road, Eugene, Oregon apartment #150  
Eugene, OR 97401  
davidk9385@msn.com  
(303) 819-2612

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Liana Aker](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Saturday, September 23, 2023 6:21:27 AM

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You don't often get email from [lianimals@forgrassroots.com](mailto:lianimals@forgrassroots.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Liana Aker  
448 E Jefferson St  
Athena, OR 97813

**From:** [Jennifer Elder](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Saturday, September 23, 2023 8:33:26 AM

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You don't often get email from aeejennifer@p2a.co. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Jennifer Elder  
10620 NW Skyline Blvd  
Portland, OR 97231

**From:** [Robert Keeth](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Saturday, September 23, 2023 8:54:48 AM

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You don't often get email from bkeeth52@advocatefor.me. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Robert Keeth  
61586 SW Blakely Rd  
Bend, OR 97702

**From:** [Doris Cellarius \(doris@cellarius.org\) Sent You a Personal Message](mailto:doris@cellarius.org)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Saturday, September 23, 2023 9:58:24 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

GHG Reductions used for CPP compliance must only be allowed if they produce direct benefits for Oregonians. Currently Northwest Natural Gas asks me - a customer- to pay extra money each month so that they can buy GHG credits from greenhouse gas sold by businesses in other states. WE will not do that- but many people may think they can help the climate by doing so. It is very deceptive.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Doris Cellarius  
5704 SE 22nd. Ave  
Portland, OR 97202  
doris@cellarius.org  
(971) 229-8480

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** KIMBERLY BEELER <campaigns@good.do>  
**Sent:** Saturday, September 23, 2023 10:51 AM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18-month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system; and
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
KIMBERLY BEELER

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This email was sent by KIMBERLY BEELER via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our

generic no-reply address at campaigns@good.do, however KIMBERLY provided an email address (kim@beelermarketing.com) which we included in the REPLY-TO field.

Please reply to KIMBERLY BEELER at kim@beelermarketing.com.

To learn more about Do Gooder visit

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To learn more about web protocol RFC 3834 visit:

<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Ftools.ietf.org%2Fhtml%2Frfc3834&data=05%7C01%7CClimate.2023%40stateoforegon.mail.onmicrosoft.com%7C8f1d472b9b248c79c4508dbbc5da8e2%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C638310882685664527%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6I1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=GyAAbJP71h9ddJPddTEubvMB99oER1KVcBEJy0J9aF8%3D&reserved=0>

**From:** [Molly Shippy \(mollyms55@msn.com\) Sent You a Personal Message](mailto:mollyms55@msn.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Saturday, September 23, 2023 12:45:39 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Molly Shippy  
3120kurt dr nw  
Salem, OR 97304  
mollyms55@msn.com  
(503) 510-6975

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

From: [solace.dnrcs](#)  
To: [2023 Climate - DEQ](#)  
Subject: 2023 Climate Rulemaking  
Date: Saturday, September 23, 2023 2:31:35 PM

You don't often get email from [solacdncs@yahoo.com](mailto:solacdncs@yahoo.com). [Learn why this is important](#)

Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered.

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- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Sincerely,

Juanita Rinas

"The need to run wild, the sense of adventure and exploration, the excitement in discovering the world of nature around me (and in me) were not acceptable in a grown woman. I go into the wilderness and rediscover the home within, to make sense of a life that didn't fit" parenthetical addition mine. quote: China Garland

**From:** [Dave King](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Saturday, September 23, 2023 3:54:07 PM

---

You don't often get email from [davewaveking@yourconstituent.com](mailto:davewaveking@yourconstituent.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Dave King  
8716 N Edison St  
Portland, OR 97203

**From:** Sheila Nelson <campaigns@good.do>  
**Sent:** Saturday, September 23, 2023 4:33 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18-month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system; and
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Sheila Nelson  
Corvallis, Oregon, 97333, United States

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This email was sent by Sheila Nelson via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic

no-reply address at campaigns@good.do, however Sheila provided an email address (macaw@peak.org) which we included in the REPLY-TO field.

Please reply to Sheila Nelson at macaw@peak.org.

To learn more about Do Gooder visit

<https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.dogooder.co%2F&data=05%7C01%7CClimate.2023%40stateoforegon.mail.onmicrosoft.com%7C327c888b94044f5bb81908dbbc8d68ec%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C638311087772409365%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Iik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=wOXHT%2Fh2ObBREf2PP6LDMDv1XcVSnhjjDfzb5nqYBAw%3D&reserved=0>

To learn more about web protocol RFC 3834 visit:

<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Ftools.ietf.org%2Fhtml%2Frfc3834&data=05%7C01%7CClimate.2023%40stateoforegon.mail.onmicrosoft.com%7C327c888b94044f5bb81908dbbc8d68ec%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C638311087772409365%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Iik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=s0VVAXtXYJpSonWEDN%2BoO3SWLhV6%2BLTykPYB88uqxM%3D&reserved=0>

**From:** [Lindsey Rickert](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Saturday, September 23, 2023 6:08:36 PM

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You don't often get email from rickert21@gmail.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

However, I was disappointed to hear that the recent rule-making table did not include community input, and also that the results lacked in meeting the plan's original goals of reducing greenhouse gas emissions by 50%, providing meaningful investments to benefit Oregonians, and holding big polluters accountable.

Therefore, I am calling on the DEQ to adapt the rules for CPP implementation to focus on the original goals of:

- 1) Reducing greenhouse gas emissions and other air pollutants, maximizing public health benefits, and minimizing costs for consumers in environmental justice and other communities in Oregon.
- 2) Keeping economic and health benefits of the Community Climate Investment program in Oregon: investments should materially benefit Oregonians at the frontlines of pollution and the climate crisis, rather than paying for cheap offsets in other places.
- 3) Achieving real reduction of emissions by 50%, rather than allowing companies to invest in biomass-derived fuels such as "renewable natural gas" (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
- 4) Holding big polluters accountable to engage in science-based "best available emissions reductions" (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.
- 5) Returning the date for a "new source" of stationary pollution to December 31, 2021.

The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
Lindsey Rickert  
4225 N Juneau St  
Portland, OR 97203

**From:** Hanna Heddy <campaigns@good.do>  
**Sent:** Saturday, September 23, 2023 6:12 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18-month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system; and
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Hanna Heddy

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This email was sent by Hanna Heddy via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic

no-reply address at campaigns@good.do, however Hanna provided an email address (hanheddy@gmail.com) which we included in the REPLY-TO field.

Please reply to Hanna Heddy at hanheddy@gmail.com.

To learn more about Do Gooder visit

<https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.dogooder.co%2F&data=05%7C01%7CClimate.2023%40stateoforegon.mail.onmicrosoft.com%7Cfbff2dc216b6474ff65a08dbbc9b4a8a%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C638311147377420011%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ikk1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=VSmv86b7QO0khRGw6RvhEtQ98TdradaXYyQCJbQ4tqI%3D&reserved=0>

To learn more about web protocol RFC 3834 visit:

<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Ftools.ietf.org%2Fhtml%2Frfc3834&data=05%7C01%7CClimate.2023%40stateoforegon.mail.onmicrosoft.com%7Cfbff2dc216b6474ff65a08dbbc9b4a8a%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C638311147377420011%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ikk1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=h7Uq%2B09vUpMPZX9dcKUHTmEy4R4UxyXTg%2Fk%2FN%2BVsscw%3D&reserved=0>

**From:** [Sarah Deumling](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** The Oregon Climate Protection Program (CPP)  
**Date:** Saturday, September 23, 2023 8:03:43 PM

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You don't often get email from sdeumling@gmail.com. [Learn why this is important](#)

We have long since run out of time to preserve the Oregon I knew as a child in the 1950s. Please, please delay no longer in aggressively tackling climate change. Some of us have been doing our best, in both small and large ways, to live simpler lives, to give up driving, to live in small spaces that need very little energy to heat, as well as encouraging/pushing the powers that be to act in the big ways only they can act - usually unsuccessfully.

In the CPP rule making process please make up for years of inaction by coming down HARD on regulated industries that would like to weasel out of restrictions. Many industries have lost out historically or reinvented themselves. It can be done again. Some folks may suffer in the short term but the long term suffering that will be inflicted by uncontrolled climate change will be FAR WORSE. I beg you to stiffen your collective backbones and stick with the strictest possible rules in this round of rule making. History, as well as your own children and grandchildren, will thank you.

Sincerely,  
Sarah Deumling  
Zena Forest LLC  
Polk County, OR

**From:** [Bonnie Singman](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Saturday, September 23, 2023 9:02:56 PM

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You don't often get email from bonsingman@gmail.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

However, I was disappointed to hear that the recent rule-making table did not include community input, and also that the results lacked in meeting the plan's original goals of reducing greenhouse gas emissions by 50%, providing meaningful investments to benefit Oregonians, and holding big polluters accountable.

Therefore, I am calling on the DEQ to adapt the rules for CPP implementation to focus on the original goals of:

- 1) Reducing greenhouse gas emissions and other air pollutants, maximizing public health benefits, and minimizing costs for consumers in environmental justice and other communities in Oregon.
- 2) Keeping economic and health benefits of the Community Climate Investment program in Oregon: investments should materially benefit Oregonians at the frontlines of pollution and the climate crisis, rather than paying for cheap offsets in other places.
- 3) Achieving real reduction of emissions by 50%, rather than allowing companies to invest in biomass-derived fuels such as "renewable natural gas" (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
- 4) Holding big polluters accountable to engage in science-based "best available emissions reductions" (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.
- 5) Returning the date for a "new source" of stationary pollution to December 31, 2021.

The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
Bonnie Singman  
14840 SE Rupert Dr  
Milwaukie, OR 97267

**From:** [melanie.carlone](mailto:melanie.carlone)  
**To:** [2023 Climate - DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Saturday, September 23, 2023 9:51:28 PM

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You don't often get email from melcarlone@gmail.com. [Learn why this is important](#)

To whom it may concern,

Let's not AGAIN go backwards due to old ways of doing things! The DEQ must ensure the Climate Protection Program stays on track to achieve its climate goals and deliver public health, economic, and job benefits for Oregon communities. Specifically, it is vital that DEQ strengthen its current proposed rules by: 1. Restricting biomethane (aka renewable natural gas (RNG) and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians. 2. Strengthening emissions reduction requirements for new or expanded large industrial facilities in Oregon under the CPP's Best Available Emissions Reduction (BAER) program.

Economic pressure to change these laws will mean NOTHING when OUR planet is no longer viable.

PLEASE do the right thing!

Dr. Melanie Carlone

Eugene, OR

\* Special thanks to the Oregon Environmental Council (OEC) for compiling this information!

**From:** [Dee fry](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Sunday, September 24, 2023 8:25:49 AM

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You don't often get email from lf97006@foradvocacy.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Dee fry  
130 SW Court Ave  
Pendleton, OR 97801

**From:** [James Rodell](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 climate rule-making  
**Date:** Sunday, September 24, 2023 11:36:10 AM

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You don't often get email from jprodell47@gmail.com. [Learn why this is important](#)

Dear DEQ.

Throughout this process, please remember your children and their children. What legacy will we leave them if climate chaos keeps on worsening?

Thank you.

James Paul Rodell  
1765 NW Grant Circle  
Corvallis, OR 97330  
541-829-9002

**Democracy and sentient life need our wise and caring stewardship.**

**From:** [Robert Powell](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Cc:** [Robert Powell](#)  
**Subject:** Rule Making Comments and support documents //  
**Date:** Sunday, September 24, 2023 1:35:12 PM  
**Attachments:** [Global CO2 weather hoaxHexmate.pdf](#)  
[NWO - elliptical orbits pg. 2.pdf](#)  
[NWO Gordon Fulks-3.pdf](#)  
[CO2 HOAX EX.PDF.pdf](#)  
[Biodiversity Treaty Wildlands Map PDF.pdf](#)

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You don't often get email from bbrocketb@bctonline.com. [Learn why this is important](#)

Good Day

This E letter to this body, is to support true possible adjustments necessary, not based on ideology, but the ethos and values of all of us in Oregon.

This process will be though the inclusion of documents, one peer reviewed and published, and reports on treaty failure and the resulting consequences. Since most actions by this body come from policies created by Federal policies, material which seems oblique to the conversation is in fact directly related to the ongoing “climate” community.

To the documents:

1. Research into Carbon as an element, beginning in 1957. This document is an accurate accounting of Revelle and his research, and more importantly for the introspection of those who believe in the “science” of CO2 as a toxin or necessity to generate draconian controls to modify, the co-opting by two individuals to regenerate into a push tool to force policies not in evidence. Please note the document was produced in 2009.

1.

2. The documents here are from Gordon Fulks an Astrophysicist who is in residence in Oregon. The basic point of the issues noted in his observations are he is not a “Federally Paid Scientist”.

2.

2.a

3. This document, while mildly more of a media view, encapsulates the questioning of CO2 program, as a true function of other than wealth distribution. This is not meant to denigrate, but remove the Carbon Tax

racketeering which simply adds burden to the Oregon Taxpayer in policies not in true evidence of need.

3.

4. One issue in bodies such as this that must be addressed is use of commission and omission, in the choice of winners and losers. This Peer reviewed and published document, with all respect, should be involved in policy discussions. The implications are clear to both the introspection and intent of the use of this treaty in ways not intended. This affects your decision process. A quick reread of Document # 2, ( the false premise ) puts society at unnecessary risk.

*At this juncture, the issue of “siloining” is necessary. Siloining is the control of information vertically by entities, while other entities operate horizontal, thus allowing data and information to be disseminated narrowly to one group, and broadly to another. To that end, two documents that appear unrelated are being included, as they in fact are the beginning of the process this body is engaged in without implicit knowledge.*

5. With all respect, what must be understood, is the road to the point you have arrived, is making decisions based on false premises, not your fault, but promoted by ideological interests. This powerpoint, ( Oregon Specific ), was built 14 years ago, and proven by the now obvious discussions by scientists refuting the United Nations ( and WEF ), Blackrock, and others. In the event time is an issue, note page # 13, and the intent of the little known “Wildlands Project”. The United Nations Environmental Program in 1995 published demands noted. I have the 1100 page publication in my library.

5. Historical Timeline: [http://www.slideshare.net/slideshow/embed\\_code/28345505](http://www.slideshare.net/slideshow/embed_code/28345505)

6. In an attempt to provide value to society, and to Oregon specifically, as my home, this map is one page and visual interpretation of the attempted control through the “Wildlands Project” created with cover of the “Biodiversity Treaty”, that was in fact rejected by the Senate and brought back, through the “Sustainable Development” policies, which are in fact not Congressionally mandated.

In conclusion, from the beginning years ago, the road leads to the false premisses that are propelling the

slow destruction of our Constitutional Founding Documents through deceit. Questions feel free, for comment does not provide the value of documentation, to the true need of integrity in decision.

With abiding respect

Lieutenant Robert K. Powell GDO ( Ret ) ph: 971-275-0510  
137990 S Mueller RD  
Oregon City, Oregon

**From:** [Kim Davis](#)  
**To:** [2023 climate - DEQ](#)  
**Subject:** Fw: Strengthen proposed 2023 climate rules  
**Date:** Sunday, September 24, 2023 2:20:37 PM

You don't often get email from [k.mcdavis@yahoo.com](mailto:k.mcdavis@yahoo.com). [Learn why this is important](#)

Please accept my apologies. I accidentally sent this email prior to completion. My completed email follows, although I am still unable to fix the indentation problem I've encountered!

----- Forwarded Message -----

**From:** Kim Davis <k.mcdavis@yahoo.com>  
**To:** [climate.2023@deq.oregon.gov](mailto:climate.2023@deq.oregon.gov) <[climate.2023@deq.oregon.gov](mailto:climate.2023@deq.oregon.gov)>  
**Sent:** Sunday, September 24, 2023 at 02:11:48 PM PDT  
**Subject:** Strengthen proposed 2023 climate rules

To Whom This Concerns:

Thank you for hearing my comment on DEQ's 2023 climate rulemaking.

Oregon's Climate Protection Program (CPP) rulemaking is critical to ensuring our state achieves our climate goals, and delivers public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP— a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments; and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregonians, their local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane or hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

As an Oregonian who suffers asthma, I could speak from my own self interest and simply state that continued degradation to our air quality is not an option. Without clean air and clean water, we, collectively, will have no true quality of life here. As an Oregonian who is committed to addressing the devastation to our biodiversity, ecosystems, climate and air and water quality, I urge you to not allow biomethane or hydrogen to increase our states emissions, or to weaken our compromise our CPP in any way.

Sincerely,  
Kim Davis  
97306

**From:** [mark.day \(detritus777@hotmail.com\)](mailto:mark.day(detritus777@hotmail.com)) Sent You a Personal Message  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Sunday, September 24, 2023 3:39:32 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

mark day  
4137 ne cleveland ave  
Portland, OR 97293  
detritus777@hotmail.com  
(503) 740-9632

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Elizabeth Menetrey \(elizabethmenetrey@yahoo.com\)](mailto:elizabethmenetrey@yahoo.com) Sent You a Personal Message  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Sunday, September 24, 2023 7:13:59 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

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- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Elizabeth Menetrey  
3849 GRAND AVE  
ASTORIA, OR 97103  
elizabethmenetrey@yahoo.com  
(503) 298-3032

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Sarah Baker](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Sunday, September 24, 2023 8:17:52 PM

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Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

However, I was disappointed to hear that the recent rule-making table did not include community input, and also that the results lacked in meeting the plan's original goals of reducing greenhouse gas emissions by 50%, providing meaningful investments to benefit Oregonians, and holding big polluters accountable.

Therefore, I am calling on the DEQ to adapt the rules for CPP implementation to focus on the original goals of:

- 1) Reducing greenhouse gas emissions and other air pollutants, maximizing public health benefits, and minimizing costs for consumers in environmental justice and other communities in Oregon.
- 2) Keeping economic and health benefits of the Community Climate Investment program in Oregon: investments should materially benefit Oregonians at the frontlines of pollution and the climate crisis, rather than paying for cheap offsets in other places.
- 3) Achieving real reduction of emissions by 50%, rather than allowing companies to invest in biomass-derived fuels such as "renewable natural gas" (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
- 4) Holding big polluters accountable to engage in science-based "best available emissions reductions" (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.
- 5) Returning the date for a "new source" of stationary pollution to December 31, 2021.

The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
Sarah Baker  
4304 NE Holman St  
Portland, OR 97218

**From:** Chuck Gehling <campaigns@good.do>  
**Sent:** Monday, September 25, 2023 8:48 AM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18-month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system; and
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Chuck Gehling

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This email was sent by Chuck Gehling via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic

no-reply address at campaigns@good.do, however Chuck provided an email address (chuck50fis@aol.com) which we included in the REPLY-TO field.

Please reply to Chuck Gehling at chuck50fis@aol.com.

To learn more about Do Gooder visit

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To learn more about web protocol RFC 3834 visit:

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**From:** [Leanne Swedberg](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 25, 2023 9:10:58 AM

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Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Leanne Swedberg  
2150 SE Hwy 101  
Lincoln City, OR 97367

**From:** [Debbie Kappel](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 25, 2023 10:40:04 AM

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Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Debbie Kappel  
25620 Tiller Trail Hwy  
Days Creek, OR 97429

**From:** [sporadic@everyactioncustom.com](mailto:sporadic@everyactioncustom.com) on behalf of [Jimmy Shaw](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 25, 2023 12:32:21 PM

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Dear Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision-making. Careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families

and communities.

Sincerely,  
Jimmy Shaw  
3039 SE Merriweather Dr Hillsboro, OR 97123-8147  
sporadic@usa.net

**From:** [aletey@everyactioncustom.com](mailto:aletey@everyactioncustom.com) on behalf of [Ardis Letey](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 25, 2023 12:33:36 PM

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Dear Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

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and communities.

Sincerely,  
Ardis Letey  
810 NW Kimo Ln Seal Rock, OR 97376-9406  
aletey@peak.org

**From:** [bibleegirl@everyactioncustom.com](mailto:bibleegirl@everyactioncustom.com) on behalf of [Debra Rehn](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 25, 2023 12:36:51 PM

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Dear Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families

and communities.

Sincerely,  
Debra Rehn  
5130 SE 30th Ave Apt 9 Portland, OR 97202-4557  
bibleogirl@aol.com

**From:** [gvsahunt@everyactioncustom.com](mailto:gvsahunt@everyactioncustom.com) on behalf of [Sharon Hunt](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 25, 2023 12:48:41 PM

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Dear Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision-making. Careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families

and communities.

Sincerely,  
Sharon Hunt  
17227 SW Loma Vista St Beaverton, OR 97007-5795  
gvsahunt@comcast.net

**From:** [gvsahunt@everyactioncustom.com](mailto:gvsahunt@everyactioncustom.com) on behalf of [Sharon Hunt](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 25, 2023 12:49:42 PM

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Dear Department of Environmental Quality,

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and communities.

Sincerely,  
Sharon Hunt  
17227 SW Loma Vista St Aloha, OR 97007-5795  
gvsahunt@comcast.net

**From:** [gorham.bill@everyactioncustom.com](mailto:gorham.bill@everyactioncustom.com) on behalf of [Bill Gorham](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 25, 2023 12:52:54 PM

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Dear Department of Environmental Quality,

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and communities.

Sincerely,  
Bill Gorham  
14834 Oceanview Dr Brookings, OR 97415-9326  
gorham.bill@gmail.com

**From:** [nate@everyactioncustom.com](mailto:nate@everyactioncustom.com) on behalf of [Nate Hildebrand](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 25, 2023 1:06:18 PM

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Dear Department of Environmental Quality,

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and communities.

Sincerely,  
Nate Hildebrand  
235 NE Ivy St Portland, OR 97212-2041  
nate@innategraphix.com

**From:** [chrysalis@everyactioncustom.com](mailto:chrysalis@everyactioncustom.com) on behalf of [Jill Wyatt](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** DEQ's draft rules for Oregon's Climate Protection Program.  
**Date:** Monday, September 25, 2023 1:25:31 PM

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Dear Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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and communities.

Sincerely,  
Jill Wyatt  
905 Park St Baker City, OR 97814-1626  
chrysalis@thegeo.net

**From:** [Lars Depriest](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 25, 2023 1:32:11 PM

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Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

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Regards,  
Lars Depriest  
308 E Linn Rd  
Eagle Point, OR 97524

**From:** [achilcote406@everyactioncustom.com](mailto:achilcote406@everyactioncustom.com) on behalf of [Ann Chilcote](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 25, 2023 1:39:43 PM

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Dear Department of Environmental Quality,

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Sincerely,  
Ann Chilcote  
17440 Holy Names Dr Unit 406 Lake Oswego, OR 97034-5146  
achilcote406@gmail.com

**From:** [carrollhenry@everyactioncustom.com](mailto:carrollhenry@everyactioncustom.com) on behalf of [Carroll Henry](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 25, 2023 1:48:13 PM

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Sincerely,  
Carroll Henry  
1605 Oak St Lake Oswego, OR 97034-4747  
carrollhenry@hotmail.com

**From:** [feuerle@everyactioncustom.com](mailto:feuerle@everyactioncustom.com) on behalf of [Lois Feuerle](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Will DEQ's draft rules Help or Hurt Oregon's Climate Protection Program.  
**Date:** Monday, September 25, 2023 2:04:51 PM

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Dear Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

OR is still 19% short of meeting our 2020 emissions reduction target, & lacks policies to put us back on track to achieve Biden's nationally determined contribution (NDC) commitment to slash U.S. emissions in half from 2005 levels by 2030. If Oregon doesn't develop additional policies & programs to reduce greenhouse gas emissions, we risk lives & livelihoods.

We must increase climate action & not miss any opportunities to strengthen Oregon's climate programs.

The OR Climate Protection Program (CPP) is only the 3rd in the nation to place an enforceable, declining cap on emissions from transportation & natural gas fuel usage. This program is critical for holding polluters accountable, & we must not accept any weakening of the CPP.

I am very worried that the DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

(1) ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS. DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I BEG the DEQ to restrict biomethane used for CPP compliance to be limited to producing direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in our compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision-making. Careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

(2) REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP. All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters

accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Sincerely,  
Lois Feuerle  
3036 SE Taylor St Portland, OR 97214-4035  
feuerle@gmail.com

**From:** [gr8trips@everyactioncustom.com](mailto:gr8trips@everyactioncustom.com) on behalf of [Richard Weinhold](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 25, 2023 2:23:51 PM

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Dear Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families

and communities.

Sincerely,  
Richard Weinhold  
2006 Highway 101 Pmb 70 Florence, OR 97439-9723  
gr8trips@yahoo.com

**From:** [yates890@everyactioncustom.com](mailto:yates890@everyactioncustom.com) on behalf of [Pamela Yates](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 25, 2023 2:30:47 PM

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Dear Department of Environmental Quality,

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and communities.

Sincerely,  
Pamela Yates  
890 NW 6th St Gresham, OR 97030-6931  
yates890@comcast.net

**From:** [mariahball@everyactioncustom.com](mailto:mariahball@everyactioncustom.com) on behalf of [Charlotta Ball](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 25, 2023 2:31:34 PM

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Dear Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

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and communities.

Sincerely,  
Charlotta Ball  
237 SE 18th Ave Apt 202 Hillsboro, OR 97123-4597  
mariahball@yahoo.com

**From:** [orhiker@everyactioncustom.com](mailto:orhiker@everyactioncustom.com) on behalf of [David Jaffe](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 25, 2023 2:33:43 PM

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Dear Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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and communities.

Sincerely,  
David Jaffe  
2645 SW 87th Ave Portland, OR 97225-4009  
orhiker@yahoo.com

**From:** [m.eliasson22@everyactioncustom.com](mailto:m.eliasson22@everyactioncustom.com) on behalf of [Marguerite Eliasson](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 25, 2023 2:33:49 PM

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Dear Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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and communities.

Sincerely,  
Marguerite Eliasson  
13180 SE Bracken Dr South Beach, OR 97366-6907  
m.eliasson22@gmail.com

**From:** [rb71246@everyactioncustom.com](mailto:rb71246@everyactioncustom.com) on behalf of [reid.bailey](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 25, 2023 2:44:16 PM

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Dear Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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and communities.

Sincerely,  
reid bailey  
4144 Summers Ln Klamath Falls, OR 97603-7953  
rb71246@gmail.com

**From:** [norm\\_lewis@everyactioncustom.com](mailto:norm_lewis@everyactioncustom.com) on behalf of [Norman Lewis](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 25, 2023 2:51:32 PM

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Dear Department of Environmental Quality,

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and communities.

Sincerely,  
Norman Lewis  
3876 Monroe St Eugene, OR 97405-2312  
norm\_lewis@comcast.net

**From:** [Scottkacek@everyactioncustom.com](mailto:Scottkacek@everyactioncustom.com) on behalf of [Scott Kacek](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 25, 2023 2:55:42 PM

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Dear Department of Environmental Quality,

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We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families

and communities.

Sincerely,  
Scott Kacek  
11603 E Burnside St Portland, OR 97216-3376  
Scottkacek@gmail.com

**From:** [don.swygard@everyactioncustom.com](mailto:don.swygard@everyactioncustom.com) on behalf of [Donald Swygard](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 25, 2023 3:07:08 PM

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Dear Department of Environmental Quality,

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and communities.

Sincerely,  
Donald Swygard  
11130 SW Meadowbrook Dr Apt 2 Tigard, OR 97224-3347  
don.swygard@gmail.com

**From:** [johnswaner@everyactioncustom.com](mailto:johnswaner@everyactioncustom.com) on behalf of [John Swaner](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. We have to increase the requirements for improving all areas of our environment.  
**Date:** Monday, September 25, 2023 3:07:13 PM

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accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Sincerely,

John Swaner

7636 SE Hawthorne Blvd Portland, OR 97215-3615

johnswaner@yahoo.com

**From:** [nfeyma@everyactioncustom.com](mailto:nfeyma@everyactioncustom.com) on behalf of [Nathaniel Feyma](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 25, 2023 3:14:36 PM

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Dear Department of Environmental Quality,

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and communities.

Sincerely,  
Nathaniel Feyma  
845 Greg Way Eugene, OR 97404-2205  
nfeyma@gmail.com

**From:** [phillip\\_callaway@everyactioncustom.com](mailto:phillip_callaway@everyactioncustom.com) on behalf of [Phillip Callaway](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 25, 2023 3:31:38 PM

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Sincerely,  
Phillip Callaway  
PO Box 243 Crawfordsville, OR 97336-0243  
phillip\_callaway@msn.com

**From:** [king.queendiva@everyactioncustom.com](mailto:king.queendiva@everyactioncustom.com) on behalf of [C.King](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 25, 2023 3:37:34 PM

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Dear Department of Environmental Quality,

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Sincerely,

C King

12884 SW Thunderhead Way Beaverton, OR 97008-6273

king.queendiva@gmail.com

**From:** [kent@everyactioncustom.com](mailto:kent@everyactioncustom.com) on behalf of [Kent Sugnet](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 25, 2023 3:42:22 PM

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Dear Department of Environmental Quality,

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Sincerely,  
Kent Sugnet  
7210 SE Clay St Portland, OR 97215-3527  
kent@fossilcartel.com

**From:** [wskater93@everyactioncustom.com](mailto:wskater93@everyactioncustom.com) on behalf of [Jane Jones](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 25, 2023 4:02:28 PM

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Dear Department of Environmental Quality,

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and communities.

Sincerely,  
Jane Jones  
PO Box 214 Milton Frwtr, OR 97862-0214  
wwskater93@gmail.com

**From:** [oregonsoma@everyactioncustom.com](mailto:oregonsoma@everyactioncustom.com) on behalf of [Janet H.](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 25, 2023 4:05:32 PM

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and communities.

Sincerely,

Janet H.

93619 E Blue Bird Ln North Bend, OR 97459-9493

[oregonsoma@peak.org](mailto:oregonsoma@peak.org)

**From:** [steven.groves1@everyactioncustom.com](mailto:steven.groves1@everyactioncustom.com) on behalf of [Steven Groves](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 25, 2023 4:10:33 PM

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Sincerely,  
Steven Groves  
1212 SW Clay St Portland, OR 97201-7817  
steven.groves1@icloud.com

**From:** [corinn19@everyactioncustom.com](mailto:corinn19@everyactioncustom.com) on behalf of [Corinn Rone](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 25, 2023 4:12:48 PM

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Dear Department of Environmental Quality,

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Sincerely,  
Corinn Rone  
61102 Steens Ln Bend, OR 97702-3370  
corinn19@hotmail.com

**From:** [leshisler@everyactioncustom.com](mailto:leshisler@everyactioncustom.com) on behalf of [Lenore Shisler](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 25, 2023 4:20:31 PM

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Dear Department of Environmental Quality,

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Sincerely,  
Lenore Shisler  
436 NW 35th St Corvallis, OR 97330-4911  
leshisler@gmail.com

**From:** [egillson3@everyactioncustom.com](mailto:egillson3@everyactioncustom.com) on behalf of [Eileene Gillson](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 25, 2023 4:25:08 PM

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Dear Department of Environmental Quality,

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and communities.

Sincerely,  
Eileene Gillson  
23225 SW Orchard Heights Pl Sherwood, OR 97140-7110  
egillson3@gmail.com

**From:** [adrianbergeron@everyactioncustom.com](mailto:adrianbergeron@everyactioncustom.com) on behalf of [Adrian Bergeron](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 25, 2023 4:25:50 PM

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Sincerely,  
Adrian Bergeron  
128 W DAWSON St Halfway, OR 97834  
adrianbergeron@yahoo.com

**From:** [cannibalbaker@everyactioncustom.com](mailto:cannibalbaker@everyactioncustom.com) on behalf of [Isabelle Rhodes-Flanary](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 25, 2023 4:31:18 PM

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Sincerely,  
Isabelle Rhodes-Flanary  
21997 Bramble Way Fairview, OR 97024-6715  
cannibalbaker@gmail.com

**From:** [lgswenson@everyactioncustom.com](mailto:lgswenson@everyactioncustom.com) on behalf of [Laurie Swenson](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 25, 2023 4:50:31 PM

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Sincerely,  
Laurie Swenson  
1136 SW Ellenhurst Pl Bend, OR 97702-1153  
lgswenson@yahoo.com

**From:** [Pamela Rislove \(pamela347a@gmail.com\) Sent You a Personal Message](mailto:pamela347a@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Monday, September 25, 2023 5:00:00 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

Any sort of fossil fuel or loop hole that allows it, or any other nastiness that does our planet no good, should be shunned and banned! Come on people. This is our ONE life on our ONE EARTH!! Let's get on our A games!

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of ?book and claim? accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Pamela Rislove  
4621 12th Ave N.E.  
Keizer, OR 97303  
pamela347a@gmail.com  
(503) 393-0083

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [ibclprof@everyactioncustom.com](mailto:ibclprof@everyactioncustom.com) on behalf of [Esther Friedman](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 25, 2023 5:34:34 PM

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Dear Department of Environmental Quality,

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and communities.

Sincerely,  
Esther Friedman  
4160 Hertel Dr S Salem, OR 97302-6173  
ibclprof@comcast.net

**From:** [magicreator@everyactioncustom.com](mailto:magicreator@everyactioncustom.com) on behalf of [Joanne M James](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 25, 2023 6:07:30 PM

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Dear Department of Environmental Quality,

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and communities.

Sincerely,  
Joanne M James  
2416 NE 7th Ave Portland, OR 97212-3815  
magicreator@gmail.com

**From:** [valkate@everyactioncustom.com](mailto:valkate@everyactioncustom.com) on behalf of [Catherine Keys](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 25, 2023 6:29:27 PM

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Sincerely,  
Catherine Keys  
321 Clay St Spc 29 Ashland, OR 97520-1344  
valkate@comcast.net

**From:** [tie.dye.steve54@everyactioncustom.com](mailto:tie.dye.steve54@everyactioncustom.com) on behalf of [Steve Walsh](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 25, 2023 6:50:26 PM

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Sincerely,  
Steve Walsh  
500 NW Division St Apt 306 Gresham, OR 97030-5524  
tie.dye.steve54@gmail.com

**From:** [valvariousmedia@everyactioncustom.com](mailto:valvariousmedia@everyactioncustom.com) on behalf of [Val Basom](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 25, 2023 7:08:30 PM

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Sincerely,  
Val Basom  
16704 SE Oatfield Rd Portland, OR 97267-5105  
valvariousmedia@yahoo.com

**From:** [momoneal77@everyactioncustom.com](mailto:momoneal77@everyactioncustom.com) on behalf of [Maureen O'Neal](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 25, 2023 7:09:45 PM

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Dear Department of Environmental Quality,

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Sincerely,  
Maureen O'Neal  
9100 SW 80th Ave Tigard, OR 97223-8981  
momoneal77@gmail.com

**From:** [mraltogether@everyactioncustom.com](mailto:mraltogether@everyactioncustom.com) on behalf of [Dana L. Petre-Miller](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 25, 2023 7:11:30 PM

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Sincerely,  
Dana L Petre-Miller  
1382 Mandarin St NE Keizer, OR 97303-3534  
mraltogether@comcast.net

**From:** [tinkernw@everyactioncustom.com](mailto:tinkernw@everyactioncustom.com) on behalf of [Paul tinker](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 25, 2023 8:19:37 PM

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families

and communities.

Sincerely,  
Paul tinker  
7307 N Foss Ave Portland, OR 97203-4723  
tinkernw@yahoo.com

**From:** [cgraham@everyactioncustom.com](mailto:cgraham@everyactioncustom.com) on behalf of [Charlie Graham](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 25, 2023 8:38:36 PM

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Dear Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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and communities.

Sincerely,  
Charlie Graham  
695 NE 4th Ave Hillsboro, OR 97124-2330  
cgraham@teleport.com

**From:** [wooflevi@everyactioncustom.com](mailto:wooflevi@everyactioncustom.com) on behalf of [Bleckinger Dana](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 25, 2023 8:52:48 PM

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Dear Department of Environmental Quality,

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and communities.

Sincerely,  
Bleckinger Dana  
PO Box 904/1045 Yachats, OR 97498  
wooflevi@yahoo.com

**From:** [gooding9009@everyactioncustom.com](mailto:gooding9009@everyactioncustom.com) on behalf of [Jeremy Gooding](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 25, 2023 9:11:40 PM

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Dear Department of Environmental Quality,

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and communities.

Sincerely,  
Jeremy Gooding  
9009 SE Causey Ave Apt H10 Happy Valley, OR 97086-8517  
gooding9009@comcast.net

**From:** [JacobsonLM1@everyactioncustom.com](mailto:JacobsonLM1@everyactioncustom.com) on behalf of [Lawrence Jacobson](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 25, 2023 9:22:44 PM

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Dear Department of Environmental Quality,

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and communities.

Sincerely,  
Lawrence Jacobson  
3640 SW Baird St Portland, OR 97219-6056  
JacobsonLM1@yahoo.com

**From:** [infomavn@everyactioncustom.com](mailto:infomavn@everyactioncustom.com) on behalf of [Melissa Hathaway](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 25, 2023 10:01:23 PM

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Dear Department of Environmental Quality,

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Sincerely,  
Melissa Hathaway  
601 NE 162nd Ave Portland, OR 97230-5751  
infomavn@teleport.com

**From:** [ltrolan@everyactioncustom.com](mailto:ltrolan@everyactioncustom.com) on behalf of [Lin Trolan](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 25, 2023 10:37:05 PM

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Dear Department of Environmental Quality,

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Sincerely,  
Lin Trolan  
1279 Lupin Ln NW Salem, OR 97304-2951  
ltrolan@yahoo.com

**From:** [catfish@everyactioncustom.com](mailto:catfish@everyactioncustom.com) on behalf of [Cat Koehn](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** DEQ's draft rules need real Climate Protection Program.  
**Date:** Monday, September 25, 2023 11:34:55 PM

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Dear Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

DEAR SIRS-Oregon is still short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

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Sincerely,

Cat Koehn

40153 Little Fall Creek Rd Fall Creek, OR 97438-9729

catfish@efn.org

**From:** [gscrooge@everyactioncustom.com](mailto:gscrooge@everyactioncustom.com) on behalf of [George Snipes](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, September 25, 2023 11:49:16 PM

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Dear Department of Environmental Quality,

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and communities.

Sincerely,  
George Snipes  
6934 SE 45th Ave Portland, OR 97206-7747  
gscrooge@bluetiehome.com

**From:** [Jana Thrift](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, September 26, 2023 1:11:27 AM

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Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Jana Thrift  
Noti, OR 97461

**From:** [vostals@everyactioncustom.com](mailto:vostals@everyactioncustom.com) on behalf of [Sarah Vostal](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, September 26, 2023 6:37:31 AM

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Dear Department of Environmental Quality,

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and communities.

Sincerely,  
Sarah Vostal  
10609 SE 37th Ave Millw Milwaukie, OR 97222-5901  
vostals@comcast.net

**From:** [Teresa Taylor](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, September 26, 2023 6:57:38 AM

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Dear Oregon Department of Environmental Quality,

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Regards,  
Teresa Taylor  
2500 NW Regency St  
Bend, OR 97703

**From:** [hitches-twitter.0c@everyactioncustom.com](mailto:hitches-twitter.0c@everyactioncustom.com) on behalf of [Kate Bolinger](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, September 26, 2023 8:23:33 AM

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and communities.

Sincerely,  
Kate Bolinger  
19910 Connarn Rd Bend, OR 97703-8117  
hitches-twitter.0c@icloud.com

**From:** [Carol Miller](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, September 26, 2023 8:36:15 AM

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Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Carol Miller  
3792 NE West Devils Lake Rd  
Lincoln City, OR 97367

**From:** [Dave King](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, September 26, 2023 8:46:13 AM

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Regards,  
Dave King  
8716 N Edison St  
Portland, OR 97203

**From:** [sumo-smog-1365@everyactioncustom.com](mailto:sumo-smog-1365@everyactioncustom.com) on behalf of [S.L. Voyles RN](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, September 26, 2023 10:06:21 AM

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Sincerely,  
S L Voyles RN  
555 NOYB St South Beach, OR 97366  
sumo-smog-1365@opayq.com

**From:** [Sharon Evanoff-Eastman](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, September 26, 2023 10:37:00 AM

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You don't often get email from [evaneastland@grassrootsmessage.com](mailto:evaneastland@grassrootsmessage.com). [Learn why this is important](#)

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**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Sharon Evanoff-Eastman  
6455 SW 33rd Pl  
Portland, OR 97239

**From:** [zebra@everyactioncustom.com](mailto:zebra@everyactioncustom.com) on behalf of [Marfa Levine](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, September 26, 2023 11:16:01 AM

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Dear Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

It is critical to hold polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Sincerely,

Marfa Levine  
650 SE Bridgeway Ave Corvallis, OR 97333-1213  
zebra@peak.org

**From:** [Emily Polanshek](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Climate Protection Plan comment  
**Date:** Tuesday, September 26, 2023 11:19:39 AM

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You don't often get email from emilypolanshek@msn.com. [Learn why this is important](#)

## To Whom It May Concern at Oregon's DEQ:

I write in support of strong rules for the Climate Protection Program (CPP), passed in December of 2021, to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more.

I am a mother and grandmother deeply concerned about the right of all children to live and prosper with confidence in a viable future.

Since the CPP originally integrated robust community input, I was dismayed to read that the recent rule-making table did not, nor has it met the plan's original goals of

- (1) reducing greenhouse gas emissions by 50%,
- (2) providing meaningful investments to benefit Oregonians, and
- (3) holding big polluters accountable.

Big polluters should be held to account to engage in science-based "best available emissions reductions" (BAER) from existing stationary sources and to deter development of new stationary sources in Oregon. Accountability must include stakeholder and frontline community input.

We cannot afford to kick the can down the road. In every locale around the globe, we must do our part by adopting decisive policies to slow and reverse the growing Climate Crisis. Even those opposed to forward-thinking policies will benefit, as will their offspring.

Let's make Oregon a leader in this urgent endeavor and help provide a livable future for humans and all other remaining species.

Please adopt rules for implementation of the CPP that restore its original goals.

Thank you,  
Emily Polanshek, Multnomah County 97219

**From:** Theodora Tsongas <campaigns@good.do>  
**Sent:** Tuesday, September 26, 2023 11:45 AM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate, health, and life of communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP— a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18-month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system; and
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits— ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Dr. Theodora Tsongas  
Portland, Oregon, 97215, United States

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This email was sent by Theodora Tsongas via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our

generic no-reply address at campaigns@good.do, however Theodora provided an email address (ttsongas@gmail.com) which we included in the REPLY-TO field.

Please reply to Theodora Tsongas at ttsongas@gmail.com.

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**From:** [somedude97355@everyactioncustom.com](mailto:somedude97355@everyactioncustom.com) on behalf of [carl tegethoff](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, September 26, 2023 12:41:27 PM

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Dear Department of Environmental Quality,

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and communities.

Sincerely,  
carl tegethoff  
724 SW Ferry Ave Siletz, OR 97380-2029  
somedude97355@hotmail.com

**From:** [Lorie Lee](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, September 26, 2023 2:31:19 PM

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Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Lorie Lee  
2490 Olive St  
Eugene, OR 97405

**From:** Amy Fvorak <campaigns@good.do>  
**Sent:** Tuesday, September 26, 2023 3:51 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18-month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
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- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Amy Fvorak  
Wilsonville, Oregon, 97070, United States

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**From:** [Justin Thompson](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, September 26, 2023 5:23:35 PM

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Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Justin Thompson  
1067 Duane St  
Astoria, OR 97103

**From:** [Roman weis](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, September 26, 2023 8:42:26 PM

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Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

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Regards,  
Roman weis  
1126 Nebraska Ave NE  
Salem, OR 97301

**From:** [7c15odt6f@everyactioncustom.com](mailto:7c15odt6f@everyactioncustom.com) on behalf of [Kevin Brown](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, September 26, 2023 8:43:23 PM

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[You don't often get email from [7c15odt6f@everyactioncustom.com](mailto:7c15odt6f@everyactioncustom.com). Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

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and communities.

Sincerely,  
Kevin Brown  
PO Box 1586 Muncie, IN 47308-1586  
7c15odt6f@relay.firefox.com

**From:** [Tyler Gilmore](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, September 26, 2023 9:07:06 PM

---

You don't often get email from tyler.a.gilmore@gmail.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

We are at a true reckoning time for the climate crisis. We can either collectively act boldly now, or suffer the consequences later, including the guilt of leaving a potentially inhabitable future home for our kids and grandkids. This isn't about an abstract future any more. This is about now, and the futures of young people who are alive right now.

The DEQ's passing of the Climate Protection Program (CPP) is a great thing. The CPP will require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

However, I was disappointed to hear that the recent rule-making table did not include community input, and also that the results lacked in meeting the plan's original goals of reducing greenhouse gas emissions by 50%, providing meaningful investments to benefit Oregonians, and holding big polluters accountable.

Therefore, I am calling on the DEQ to adapt the rules for CPP implementation to focus on the original goals of:

- 1) Reducing greenhouse gas emissions and other air pollutants, maximizing public health benefits, and minimizing costs for consumers in environmental justice and other communities in Oregon.
- 2) Keeping economic and health benefits of the Community Climate Investment program in Oregon: investments should materially benefit Oregonians at the frontlines of pollution and the climate crisis, rather than paying for cheap offsets in other places.
- 3) Achieving real reduction of emissions by 50%, rather than allowing companies to invest in biomass-derived fuels such as "renewable natural gas" (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
- 4) Holding big polluters accountable to engage in science-based "best available emissions reductions" (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.
- 5) Returning the date for a "new source" of stationary pollution to December 31, 2021.

The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
Tyler Gilmore  
4616 SE Milwaukie Ave, #28  
Portland, OR 97202

**From:** [Robert Izatt](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, September 26, 2023 9:24:28 PM

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You don't often get email from izatt3192r@p2a.co. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

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Regards,  
Robert Izatt  
9222 N Lombard St  
Portland, OR 97203

**From:** David Vitello <campaigns@good.do>  
**Sent:** Tuesday, September 26, 2023 9:27 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP— a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18-month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system; and
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits— ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Aya Vitello  
Beaverton, Oregon, 97008, United States

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This email was sent by David Vitello via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic

no-reply address at campaigns@good.do, however David provided an email address (dmvitello@msn.com) which we included in the REPLY-TO field.

Please reply to David Vitello at dmvitello@msn.com.

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To learn more about web protocol RFC 3834 visit:

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**From:** [Katie Abbott \(jkr@bendbroadband.com\) Sent You a Personal Message](mailto:jkr@bendbroadband.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Tuesday, September 26, 2023 9:35:46 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Katie Abbott  
21090 LIMESTONE AVE  
BEND, OR 97703  
jkr@bendbroadband.com  
(541) 280-9845

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [jkr@everyactioncustom.com](mailto:jkr@everyactioncustom.com) on behalf of [Katie Abbott](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, September 26, 2023 9:53:28 PM

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Dear Department of Environmental Quality,

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Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

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Sincerely,  
Katie Abbott  
21090 Limestone Ave Bend, OR 97703-8964  
jkr@bendbroadband.com

**From:** [Jolie Frank](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Tuesday, September 26, 2023 10:45:36 PM

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You don't often get email from [joliefrank70@advocacymessages.com](mailto:joliefrank70@advocacymessages.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Jolie Frank  
398 NE 79th Ave  
Hillsboro, OR 97006

**From:** [Donna Pedace](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Wednesday, September 27, 2023 1:19:15 AM

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Dear Oregon Department of Environmental Quality,

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Regards,  
Donna Pedace  
420 Radar Rd  
Coos Bay, OR 97420

**From:** [Edith Cronk](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Wednesday, September 27, 2023 5:04:10 AM

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You don't often get email from edithlynncronk@forgrassroots.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Edith Cronk  
1601 Rhododendron Dr  
Florence, OR 97439

**From:** [psboss@everyactioncustom.com](mailto:psboss@everyactioncustom.com) on behalf of [Sarah Bosserman](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Wednesday, September 27, 2023 6:49:55 AM

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[You don't often get email from [psboss@everyactioncustom.com](mailto:psboss@everyactioncustom.com). Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

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**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families

and communities.

Sincerely,  
Sarah Bosserman  
15085 SE Sedona Dr Clackamas, OR 97015-7626  
psboss@yaho.com

**From:** Elaine McFarlane <campaigns@good.do>  
**Sent:** Wednesday, September 27, 2023 6:52 AM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP— a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18-month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system; and
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits— ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Elaine McFarlane

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This email was sent by Elaine McFarlane via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic

no-reply address at campaigns@good.do, however Elaine provided an email address (elainemc@peak.org) which we included in the REPLY-TO field.

Please reply to Elaine McFarlane at elainemc@peak.org.

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**From:** [Heather Powell](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Wednesday, September 27, 2023 7:30:15 AM

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Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

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most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Heather Powell  
909 SW 12th Ave  
Portland, OR 97205

**From:** [ELBEL Elizabeth \\* DEQ](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Fwd: Current Regulatory Proposals and Treatment of Net-Zero Power Generation  
**Date:** Wednesday, September 27, 2023 9:32:40 AM  
**Attachments:** [image001.png](#)

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FYI

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**From:** Scott Lipton <[slipton@enchantedrock.com](mailto:slipton@enchantedrock.com)>  
**Sent:** Monday, September 25, 2023, 8:53 AM  
**To:** ELBEL Elizabeth \* DEQ <[Elizabeth.ELBEL@deq.oregon.gov](mailto:Elizabeth.ELBEL@deq.oregon.gov)>; SINGH Nicole \* DEQ <[Nicole.SINGH@deq.oregon.gov](mailto:Nicole.SINGH@deq.oregon.gov)>  
**Subject:** Current Regulatory Proposals and Treatment of Net-Zero Power Generation

Some people who received this message don't often get email from [slipton@enchantedrock.com](mailto:slipton@enchantedrock.com). [Learn why this is important](#)

Elizabeth and Nicole,

Good morning.

I have been reviewing the proposed Climate 2023 Rulemaking and the ongoing efforts to promulgate regulations surrounding the implementation of HB2021 in Oregon. I was hoping to connect with you to better understand how DEQ views / treats net-zero GhG power generation at generation capacities beyond 25 megawatts.

My contact information is below, and I look forward to being able to connect.

Best,

Scott



**Scott D. Lipton**

Energy Policy Manager, Western Region

P: 661-428-7732

E: [slipton@enchantedrock.com](mailto:slipton@enchantedrock.com)

W: [enchantedrock.com](http://enchantedrock.com)

**From:** [Garry Zimmerman](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Wednesday, September 27, 2023 9:58:25 AM

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You don't often get email from garryzimmerman56@forgrassroots.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Garry Zimmerman  
162 Pamela Ct  
Myrtle Creek, OR 97457

**From:** [Contra Costa Progressives](#)  
**To:** [TRAPP Lindsay \\* DEQ](#)  
**Subject:** DEQ's 2023 Climate Rulemaking  
**Date:** Wednesday, September 27, 2023 11:13:52 AM

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## **DEQ Rulemaking Comments**

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking.

The proposed rules would undermine the intended objectives of the program by reducing clean energy projects built here in Oregon, meaning fewer jobs and other local economic benefits particularly for environmental justice communities across the state.

Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane or hydrogen investments and would enable the expansion of new large industrial carbon emitters.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane used for CPP compliance to that which is produced here in Oregon and provided direct benefits for Oregonians and not allow out of state RNG credits.
- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system.
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Peter Dragovich  
Eugene, OR

**From:** [Martha or Peter Dragovich](#)  
**To:** [TRAPP Lindsay \\* DEQ](#)  
**Subject:** DEQ's 2023 Climate Rulemaking.  
**Date:** Wednesday, September 27, 2023 11:14:05 AM

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Dear Members of the DEQ rule-making committee,

Thank you for the opportunity to submit testimony on DEQ's 2023 climate rulemaking.

I am concerned that the current concessions to regulated industries allow out-of-state RNG bio-methane investments and could enable the expansion of new large industrial emitters, defeating the goals of the Climate Protection Plan (CPP). The current proposed rule amendments will compromise the program's intended public health, economic, and employment goals, and hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

I also ask that you strengthen the emissions reduction requirements for new or expanded stationary source facilities in Oregon under the BAER Act. These large emitters must pivot to use their economic base to be part of the solution, not part of the problem.

This rule-making is vital to ensure this program stays on track to achieve its stated climate, public health, and economic goals. You are in a crucial role to make sure this actually happens.

Thank you for considering this testimony.

Martha Dragovich

Eugene, OR

**From:** [Sean Gibson](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment  
**Date:** Wednesday, September 27, 2023 11:36:31 AM  
**Attachments:** [Outlook-zgqlllyv.png](#)  
[Modern Hydrogen OR Climate 2023 Comment Letter.pdf](#)

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You don't often get email from sean.gibson@modernhydrogen.com. [Learn why this is important](#)

Please find attached a comment letter for consideration in the Climate 2023 Rulemaking process, submitted on behalf of Modern Hydrogen.

Please let us know if you have any questions.

Regards,  
Sean



**Sean Gibson**  
Government Relations  
(650) 762-9587  
[ModernHydrogen.com](#)  
[Sean.Gibson@ModernHydrogen.com](mailto:Sean.Gibson@ModernHydrogen.com)

**From:** Debbie Kaye <campaigns@good.do>  
**Sent:** Wednesday, September 27, 2023 12:04 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18-month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

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- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system; and
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Debbie Kaye  
Portland, Oregon, 97210, United States

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This email was sent by Debbie Kaye via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic

no-reply address at campaigns@good.do, however Debbie provided an email address (djek53@aol.com) which we included in the REPLY-TO field.

Please reply to Debbie Kaye at djek53@aol.com.

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**From:** [SINGH Nicole \\* DEQ](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** FW: Comments on CPP proposed rules - Changes needed  
**Date:** Wednesday, September 27, 2023 2:13:49 PM

---

Nicole Singh (*she/her*)  
Senior Climate Policy Advisor, Office of Greenhouse Gas Programs  
Oregon Department of Environmental Quality  
503-869-2119  
[nicole.singh@deq.oregon.gov](mailto:nicole.singh@deq.oregon.gov)

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**From:** TRAPP Lindsay \* DEQ <[lindsay.trapp@deq.oregon.gov](mailto:lindsay.trapp@deq.oregon.gov)>  
**Sent:** Wednesday, September 27, 2023 7:47 AM  
**To:** MCCONNAHA Colin \* DEQ <[Colin.MCCONNAHA@deq.oregon.gov](mailto:Colin.MCCONNAHA@deq.oregon.gov)>; SINGH Nicole \* DEQ <[Nicole.SINGH@deq.oregon.gov](mailto:Nicole.SINGH@deq.oregon.gov)>; ELBEL Elizabeth \* DEQ <[Elizabeth.ELBEL@deq.oregon.gov](mailto:Elizabeth.ELBEL@deq.oregon.gov)>  
**Subject:** FW: Comments on CPP proposed rules - Changes needed

Good morning,

Please see public comment submission below.

Thanks, and hope you all have a great day!

**Lindsay Trapp** (*she/her*)  
Environmental Quality Commission Policy Analyst & Assistant  
Oregon Department of Environmental Quality  
[lindsay.trapp@deq.oregon.gov](mailto:lindsay.trapp@deq.oregon.gov)  
Cell: 971-357-4893

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**From:** Ken Jones <[meta4ken350@gmail.com](mailto:meta4ken350@gmail.com)>  
**Sent:** Tuesday, September 26, 2023 6:19 PM  
**To:** TRAPP Lindsay \* DEQ <[lindsay.trapp@deq.oregon.gov](mailto:lindsay.trapp@deq.oregon.gov)>  
**Subject:** Comments on CPP proposed rules - Changes needed

You don't often get email from [meta4ken350@gmail.com](mailto:meta4ken350@gmail.com). [Learn why this is important](#)

TO: DEQ

I appreciate that you are looking at and taking into consideration the public's comments on the Climate Protection Program proposed rules since they overwhelmingly supported a strong Program. I am not an employee of any company that has a financial interest in this policy, just very

concerned about our deteriorating climate and all it brings.

The Dept. of Environmental Quality in Oregon needs to stand for only the best policy for restoring our balanced climate. I am new to Oregon but have seen efforts to undermine state climate policy by natural gas interests in two other states I have lived in.

Don't let that happen here, please.

First I am very concerned that the rules are not specific enough on the type of hydrogen that might get invested in. Only "green" hydrogen in the truest sense should be allowed. It should be spelled out specifically. Otherwise, you will make climate pollution even worse

Next, I see that biomethane - again be very clear on how well it is captured - from even out of state might suffice for getting a RNG credit. So many ways that is wrong. The economic and health benefits only then go to citizens outside the state, except for some investors or company executives.

Finally, new or expanded stationary source facilities must be pushed in the policy rules to conform to even stronger emissions requirements. So, that should be spelled out more clearly in the Best Available Emissions Reductions Program.

I don't think the Oregon public will be happy with a compromised Climate Protection Program.

Thank you for this opportunity to give my thoughts about the CPP proposed rules.

Ken Jones  
1716 W. 27th Pl  
Eugene, OR 97405

:

**From:** [Gail Curtis](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Wednesday, September 27, 2023 6:44:34 PM

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You don't often get email from [gailcurtis123@advocatefor.me](mailto:gailcurtis123@advocatefor.me). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

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This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Gail Curtis  
12940 NW Marina Way  
Portland, OR 97231

**From:** [Mary Wall](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** strengthen proposed 2023 climate rules  
**Date:** Wednesday, September 27, 2023 8:46:16 PM

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You don't often get email from marwal53@gmail.com. [Learn why this is important](#)

Dear Dept of Environmental Quality,

There are two very important requests that I would like to make in order for our community to thrive over the long term. Our health and safety is threatened by the continued uninhibited use of oil and gas in our world. We need to make it a priority to find alternatives and to limit the byproducts of oil and gas production now.

Please restrict bio methane (RNG) and hydrogen in order to comply with CPP.

Also strengthen emission reduction requirements for new or expanded large industrial facilities in Oregon under the CPP's best Available Emissions Reduction (BAER)

This is an imperative first step in our health and survival. Thank you, Mary Wall

**From:** [Julie Kristine Sonam](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 climate rule making  
**Date:** Wednesday, September 27, 2023 9:31:29 PM

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You don't often get email from gratefulrightnow@gmail.com. [Learn why this is important](#)

I am opposed to any and all rules that would not protect our environment. I oppose rules that would allow gas utilities to use out of state bio methane investments. I oppose any expansion of industrial emitters. I oppose unchecked climate pollution in Oregon. Come on people, WHAT THE HECK, why is it even a conversation. You know what the right thing to do is. Quit acting like we can go on like this. We must change or die. Please choose to protect our environment. Please.

Sincerely,  
Julie Sonam

Julie Sonam  
Hearthstone Real Estate  
541.335.1225

**From:** [Deborah Roth](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Wednesday, September 27, 2023 9:43:43 PM

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You don't often get email from [deborahroth@p2a.co](mailto:deborahroth@p2a.co). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Deborah Roth  
Corbett, OR 97019

**From:** [Jessica Sarri-Wong](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Thursday, September 28, 2023 4:03:53 AM

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You don't often get email from [jesslynn55@sendgrassroots.com](mailto:jesslynn55@sendgrassroots.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Jessica Sarri-Wong  
820 Pinecrest Terrace  
Ashland, OR 97520

**From:** [Mary McVey](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Thursday, September 28, 2023 5:44:23 AM

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You don't often get email from [mkagainstclimatechange@advocatefor.me](mailto:mkagainstclimatechange@advocatefor.me). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Mary McVey  
3943 Summit Ridge Cir  
Depoe Bay, OR 97341

**From:** [Dustin Parson](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Thursday, September 28, 2023 6:29:01 AM

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Dear Oregon Department of Environmental Quality,

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Regards,  
Dustin Parson  
4070 Royal Ave  
Eugene, OR 97402

**From:** [Jacob Crabill](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Thursday, September 28, 2023 6:58:37 AM

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You don't often get email from [jacob.crabill@p2a.co](mailto:jacob.crabill@p2a.co). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

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Regards,  
Jacob Crabill  
476 SW Forest Grove Dr  
Bend, OR 97702

**From:** [Tyler McQueen](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Comments for Discussion Draft Rules – Division 215  
**Date:** Thursday, September 28, 2023 7:56:22 AM  
**Attachments:** [Twin Eagle Comments on 2023 Rulemaking 9.28.23.pdf](#)

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You don't often get email from tyler.mcqueen@twineagle.com. [Learn why this is important](#)

Twin Eagle is a non-covered marketing entity.

Twin Eagle appreciates the opportunity to provide comments regarding the latest proposed rule changes under the Discussion Draft Rules – Division 215 Climate 2023 Rulemaking Advisory Committee GHG Reporting Program.

Twin Eagle believes a deliberate omission of electrolytic hydrogen and other waste feedstocks as components in biomethane and renewable natural gas will be detrimental to the progress of the CPP. We believe the current proposed language prohibits the participation of “Renewable Hydrogen” derived fuels as part of the Climate Protection Program.

We believe the commission should include additional language under “Biogas”, “Biomethane”, and “Renewable Natural Gas” to support Power-to-X fuels.

The attached comments are to help and ensure that DEQ does not impermissibly preclude renewable fuels made from certain renewable biomass and renewable resources from participating in the CPP program. Our proposed changes and definitions are to help advise the committee on how best to achieve the stated goals of the CPP.

Please find attached our comments.

Best,

**Tyler McQueen**

**TWIN EAGLE**™  
**1700 City Plaza Drive, Suite 500**  
**Spring, Texas 77389**  
281-653-0829 office  
[Tyler.McQueen@twineagle.com](mailto:Tyler.McQueen@twineagle.com)  
[www.twineagle.com](http://www.twineagle.com)

**From:** [Helena Birecki](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking-- please further protect Oregonians' health, safety, and economy  
**Date:** Thursday, September 28, 2023 8:03:51 AM

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You don't often get email from helenaster@gmail.com. [Learn why this is important](#)

Dear Chair George, Members of the Environmental Quality Commission, and DEQ staff,

Regarding DEQ's Climate 2023 Rulemaking, it is clear that an enormous amount of work, expertise, and care went into the proposed rules. I thank you for considering public comment to improve the rules further— I strongly urge you to amend the proposed rules in three ways in order to fulfill the aims of the Climate Protection Program (CPP). I urge you to:

1. Eliminate the option to use out-of-state biomethane or hydrogen for CPP compliance,
2. Strengthen emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program, and
3. Regulate both biomethane and hydrogen across additional health and safety metrics that are essential to achieving the CPP aims of reducing other air pollutants and improving public welfare for Oregon communities.\*

I care about this because:

First, as a current resident of Tillamook County and a member of the Climate Reality Project, I am acutely aware of the dangers of climate-change fueled storm surge, flooding, and wildfire risk and fully support climate protection.

Second, having friends in Richmond and Rodeo (California), I know the long-term health harms they have suffered from regular flaring pollution from high temperature hydrogen production. It doesn't matter whether that hydrogen is produced from biogas, biomass, or landfill waste instead of fossil fuels— the flaring risk remains high for all of those pathways. The only safe hydrogen production is green electrolytic production at low temperatures.

Third, about three years ago a "natural gas" (methane) line exploded in my acquaintance's apartment building— he was hospitalized with third degree burns for almost two months, barely saved his elderly neighbor's life, and lost his dog and cat to the flames. The explosion risk of methane is the same whether the methane is "bio" or "fossil."

Fourth, it is clear that solutions like biomethane cannot be solutions at scale. The supply of waste from which to create biomethane is limited— Oregon DOE estimates that gross potential for production is only between 4.6 and 17.5% of Oregon's yearly natural gas usage. Any biomethane policy that incentivizes additional waste production would be harmful to Oregonians, add greenhouse gas emissions, and in

the case of incentivizing additional cow manure, would directly affect water quantity and quality. Additionally, biomethane leaks just like fossil methane, adding extremely potent greenhouse gas — with a global warming potential 86 times that of carbon dioxide over a 20 year period, and a 100 year GWP of 25— to our atmosphere from every leaking production site, pipe, or appliance.

Fifth, for homes and vehicles, direct electrification is several times more efficient than hydrogen— this means direct electrification can serve more needs more affordably. Don't let "hydrogen creep" cut into Oregonians' wallets and energy security— create rules to limit hydrogen to 1) uses that cannot otherwise be decarbonized such as fertilizer and steel production and 2) the amounts that can be produced electrolytically using solar or wind energy that is in excess of grid needs.

It's essential that Oregon's climate rules address the climate crisis in ways that help people in real life. Because GHG calculations on spreadsheets often leave out important metrics, the spreadsheets don't tell the whole story. Considering pollutants other than GHGs, public safety, and water and food security is necessary for real climate protection.

Thank you in advance for upholding all four of the Climate Protection Program's aims in your final rule-making. Reduce greenhouse gas emissions, accelerate the phase-out of fossil fuels, reduce other air pollutants, and improve public welfare for Oregon communities, particularly environmental justice communities.

Sincerely,  
Helena Birecki  
resident of Tillamook County, OR

\*<https://www.oregon.gov/deq/ghgp/cpp/pages/default.aspx>

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References:

<https://blogs.edf.org/energyexchange/2023/01/30/rule-1-of-deploying-hydrogen-electrify-first/>

<https://oregoncapitalchronicle.com/2023/07/25/historic-change-facing-drought-legislators-impose-water-limits-on-livestock/> (Governor Kotek signed SB85 since the article was published)

<https://www.oregon.gov/energy/Data-and-Reports/Documents/2018-RNG-Inventory-Report.pdf>

<https://acp.copernicus.org/articles/22/9349/2022/acp-22-9349-2022.pdf>

<https://www.canarymedia.com/articles/fossil-fuels/aerial-and-satellite-imagery-can-find-methane-leaks-will-epa-bake-the-tech-into-new-rules>

<https://www.energy.ca.gov/sites/default/files/2021-05/CEC-500-2020-034.pdf>

**From:** [Josie Crandall](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Thursday, September 28, 2023 8:07:17 AM

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You don't often get email from [josiecrandall222@advocatefor.me](mailto:josiecrandall222@advocatefor.me). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
Josie Crandall  
2135 Grant St  
Eugene, OR 97405

**From:** [SINGH Nicole \\* DEQ](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** FW: CPP comment  
**Date:** Thursday, September 28, 2023 9:11:31 AM

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Nicole Singh (*she/her*)  
*Senior Climate Policy Advisor, Office of Greenhouse Gas Programs*  
Oregon Department of Environmental Quality  
503-869-2119  
[nicole.singh@deq.oregon.gov](mailto:nicole.singh@deq.oregon.gov)

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**From:** TRAPP Lindsay \* DEQ <[lindsay.trapp@deq.oregon.gov](mailto:lindsay.trapp@deq.oregon.gov)>  
**Sent:** Thursday, September 28, 2023 7:54 AM  
**To:** MCCONNAHA Colin \* DEQ <[Colin.MCCONNAHA@deq.oregon.gov](mailto:Colin.MCCONNAHA@deq.oregon.gov)>; SINGH Nicole \* DEQ <[Nicole.SINGH@deq.oregon.gov](mailto:Nicole.SINGH@deq.oregon.gov)>; ELBEL Elizabeth \* DEQ <[Elizabeth.ELBEL@deq.oregon.gov](mailto:Elizabeth.ELBEL@deq.oregon.gov)>  
**Subject:** FW: CPP comment

Good morning,

Below is another public comment submission.

Thanks!

**Lindsay Trapp** (*she/her*)  
Environmental Quality Commission Policy Analyst & Assistant  
Oregon Department of Environmental Quality  
[lindsay.trapp@deq.oregon.gov](mailto:lindsay.trapp@deq.oregon.gov)  
Cell: 971-357-4893

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**From:** Mary Addams <[maryaddamsor@gmail.com](mailto:maryaddamsor@gmail.com)>  
**Sent:** Wednesday, September 27, 2023 4:47 PM  
**To:** TRAPP Lindsay \* DEQ <[lindsay.trapp@deq.oregon.gov](mailto:lindsay.trapp@deq.oregon.gov)>  
**Subject:** CPP comment

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The Climate Protection Program was adopted with overwhelming public support following an extensive stakeholder engagement process and was designed to benefit the residents of Oregon.

The proposed DEQ rules would undermine the intended objectives of the program by reducing clean energy projects built here in Oregon, meaning fewer jobs and other local economic benefits

particularly for environmental justice communities across the state.

I strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane used for CPP compliance to that which is produced here in Oregon and provide direct benefits for Oregonians and not allow out of state RNG credits.
- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system.
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

These updates are critical to ensure that Oregon stays on track to achieve our climate goals and to maximize the associated job creation, cost saving, public health, and economic development benefits here in Oregon.

Thank you.

Mary Addams  
1688 Hayes St., Unit B  
Eugene 97402

**From:** [Andrew Loia](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 28, 2023 9:43:23 AM

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You don't often get email from [andrewloia@gmail.com](mailto:andrewloia@gmail.com). [Learn why this is important](#)

Dear Commissioners,

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that the Department of Environmental Quality (DEQ)'s draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. For the CPP to deliver, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. Hydrogen is a leak-prone gas, and the risks of hydrogen leakage must be incorporated into our decision-making.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Best Available Emissions Reduction (BAER) assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Thank you for your consideration,

Sincerely,  
Andrew Loia  
1551 North Webster Street  
Portland, OR 97217

**From:** [Troy James](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 28, 2023 10:28:28 AM

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You don't often get email from [tjameswinslow@gmail.com](mailto:tjameswinslow@gmail.com). [Learn why this is important](#)

Chair George, Vice Chair Baraso, members of the Commission:

My name is Troy Winslow and I am a volunteer with Families for Climate. I am a parent to Aldous & Sullivan. I am writing this testimony because as their parent, my most fundamental responsibility is to protect them from harm, and irreversible climate change gravely threatens their future.

The Climate Protection Program is absolutely critical for Oregon to reduce our climate pollution on the urgent timeline dictated by current science. However, I am deeply concerned that the current proposed rules would undermine the effectiveness of the CPP, and put the necessary emissions reductions out of reach.

Specifically, I am worried that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane offsets, which will hinder the transition to non-emitting alternatives, while failing to deliver direct benefits to Oregonians. I am also worried that the rules as currently written will allow new industrial emitters to produce unrestricted climate pollution in Oregon.

I am asking DEQ to make the following important changes to the rulemaking:

**Restrict biomethane (aka renewable natural gas (RNG) and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians.** The stated goals of the CPP are to reduce greenhouse gas emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers, and out-of-state offsets accomplish none of those goals.

**Strengthen emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction (BAER) program.** As the only existing state regulation on major industrial emitters, it is vital that the CPP works to ensure science-based emissions reductions from existing stationary sources and deter development of new stationary sources in Oregon. Given Oregon's growing industrial sector, it is especially critical that DEQ use this rulemaking to strengthen the integrity of the BAER program. Large industrial emitters must be held accountable for their climate pollution.

Oregon families need the Climate Protection Program to live up to its name. Please strengthen the rules so it can protect our children's future, not corporate profits.

Thank you for the opportunity to comment on this rulemaking.

Troy Winslow

**From:** [wobobr123@everyactioncustom.com](mailto:wobobr123@everyactioncustom.com) on behalf of [Bill OBrien](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Thursday, September 28, 2023 6:52:51 PM

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Dear Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision-making. Careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families

and communities.

Sincerely,  
Bill OBrien  
12520 SW Gem Ln Apt 202 Beaverton, OR 97005-1360  
wobobr123@yahoo.com

**From:** [Ben Stickney](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, September 28, 2023 8:35:39 PM

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You don't often get email from ben.demilo@gmail.com. [Learn why this is important](#)

Chair George, Vice Chair Baraso, members of the Commission:

My name is Ben Stickney, I am a Portland resident, a father, and I am a volunteer with Families for Climate. I am writing this testimony as my most fundamental responsibility to protect my children from the harm of irreversible climate change that gravely threatens their future.

The Climate Protection Program is absolutely critical for Oregon to reduce our climate pollution on the urgent timeline dictated by current science. However, I am deeply concerned that the current proposed rules would undermine the effectiveness of the CPP, and put the necessary emissions reductions out of reach.

Specifically, I am worried that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane offsets, which will hinder the transition to non-emitting alternatives, while failing to deliver direct benefits to Oregonians. I am also worried that the rules as currently written will allow new industrial emitters to produce unrestricted climate pollution in Oregon.

I am asking DEQ to make the following important changes to the rulemaking:

1. **Eliminate provisions permitting biomethane (aka renewable natural gas (RNG) used for CPP compliance.** The stated goals of the CPP are to reduce greenhouse gas emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers, and out-of-state offsets accomplish none of those goals.
2. **Strengthen emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction (BAER) program.** As the only existing state regulation on major industrial emitters, it is vital that the CPP works to ensure science-based emissions reductions from existing stationary sources and deter development of new stationary sources in Oregon. Given Oregon's growing industrial sector, it is especially critical that DEQ use this rulemaking to strengthen the integrity of the BAER program. Large industrial emitters must be held accountable for their climate pollution. Unfortunately, since the adoption of the final CPP rules in 2021, increasing emissions from Oregon's industrial sector has become a reality. As one example, Amazon is seeking multiple permits to build or expand operations at several energy-

intensive, fossil gas-powered data centers in Eastern Oregon; these data centers alone will result in an enormous increase in gas use and GHG emissions. Further, in the 2023 legislative session, lawmakers adopted the “Oregon CHIPS Act,” which provides \$210 million in funding and creates land use exemptions to accelerate the development of semiconductor plants or other advanced manufacturing facilities. While the economic prospects of industrial innovation is a tantalizing opportunity for the state, expansion must be measured against environmental harm that may result from fast-tracking expanded operations.

Oregon families need the Climate Protection Program to live up to its name. Please strengthen the rules so they can protect our children’s future, not corporate profits.

Thank you for the opportunity to comment on this rulemaking.

**From:** [Catalina de Onís](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Strengthening Climate Protections Essential in 2023 Rulemaking  
**Date:** Friday, September 29, 2023 8:22:10 AM

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Dear Department of Environmental Quality Members:

Thank you for providing space for residents to offer their perspectives during the DEQ's 2023 climate rulemaking. I write as a concerned educator and researcher of environmental, climate, and energy justice studies—as well as a Willamette Valley resident for many years. As those of us who participate in policymaking know, this rulemaking carries significant impacts for the environments we live and work in throughout Oregon.

The Climate Protection Program (CPP) marks an indispensable framework, and for this plan to be implemented successfully, a rulemaking process that values environmental, climate, and energy justice and equity is essential for ensuring Oregon can achieve its climate goals. These goals are required to support equitable public health and employment benefits for communities experiencing the greatest negative impacts of global heating and climate-fueled disasters in Oregon. I am concerned that if the rulemaking process continues to support the powerful influences and interests of corporate polluters, especially those representing the fossil fuel industry, then there will be serious consequences that will further marginalize and harm environmental and climate justice communities (i.e., rural, low-income and low-wealth, and Black, Indigenous, and other People of Color communities).

I am gravely concerned that the DEQ's current proposed rules would work against the CPP. This program is vital for reaching our state's climate pollution reduction goals. The CPP also received overwhelming public support following an extensive 18-month rulemaking process that included significant stakeholder engagement. Unacceptably, the DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments. Additionally, the current rules risk the expansion of large industrial polluters. These new emitters will continue fueling climate disruption, while polluting Oregon's air and land. The DEQ's current support for corporate polluters threatens the CPP's intended public health, economic, and employment goals. With these major aspects of life and wellbeing in jeopardy, Oregon workers, local economies, and environmental and climate justice communities across the state will suffer and have to continue expending their limited energy and resources to work against ongoing and expanding injustices and inequities. Therefore, in solidarity with Beyond Toxics and other aligned environmental and climate justice advocacy groups, I urge the DEQ to amend the proposed rules by:

- Restricting biomethane or hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of “book and claim” accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon. Allowing covered fuel suppliers to rely on out-of-state biomethane presents the deeply concerning likelihood that investments will be diverted from the Community Climate Investment (CCI) program; and
- Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction (BAER) program.

Thank you for considering my written testimony. I hope the DEQ will side with Oregon

residents who know that climate protections are vital. We must act now to support all people living in the state--especially communities marginalized and harmed by dominant systems of power that continue to exploit and devalue rural, low-income and low-wealth, and Black, Indigenous, and other People of Color communities.

Sincerely,

Catalina de Onis, PhD  
Eugene resident  
Energy and climate justice educator and scholar

**From:** [SINGH Nicole \\* DEQ](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** FW: DEQ Rulemaking Comments  
**Date:** Friday, September 29, 2023 8:28:42 AM

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Nicole Singh (*she/her*)  
*Senior Climate Policy Advisor, Office of Greenhouse Gas Programs*  
Oregon Department of Environmental Quality  
503-869-2119  
[nicole.singh@deq.oregon.gov](mailto:nicole.singh@deq.oregon.gov)

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**From:** TRAPP Lindsay \* DEQ <lindsay.trapp@deq.oregon.gov>  
**Sent:** Friday, September 29, 2023 7:40 AM  
**To:** MCCONNAHA Colin \* DEQ <Colin.MCCONNAHA@deq.oregon.gov>; SINGH Nicole \* DEQ <Nicole.SINGH@deq.oregon.gov>; ELBEL Elizabeth \* DEQ <Elizabeth.ELBEL@deq.oregon.gov>  
**Subject:** FW: DEQ Rulemaking Comments

Good morning,

Please see another public comment below.

Thanks!

**Lindsay Trapp** (*she/her*)  
Environmental Quality Commission Policy Analyst & Assistant  
Oregon Department of Environmental Quality  
[lindsay.trapp@deq.oregon.gov](mailto:lindsay.trapp@deq.oregon.gov)  
Cell: 971-357-4893

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**From:** Elliott Grey <[ellrey105@gmail.com](mailto:ellrey105@gmail.com)>  
**Sent:** Thursday, September 28, 2023 10:09 PM  
**To:** TRAPP Lindsay \* DEQ <[lindsay.trapp@deq.oregon.gov](mailto:lindsay.trapp@deq.oregon.gov)>  
**Subject:** DEQ Rulemaking Comments

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Hello my name is Elliott Grey

Thank you Chair, members of the commission and staff for the opportunity to provide comment on DEQ's 2023 climate rulemaking.

The Climate Protection Program is potentially one of the most significant tools that Oregon has to reduce climate pollution in our state and it has been designed to bring health and economic benefits to the residents of our state. But this program will only be effective if the details of the rules support the purpose of the program.

**The current proposed rules would effectively undermine the purpose of the CPP. This program was adopted with overwhelming public support following an extensive stakeholder engagement process and was designed to benefit the residents of Oregon not big business!!!**

The rules proposed undermine the intended objectives of the program by reducing clean energy projects built here in Oregon, meaning fewer jobs and other local economic benefits particularly for environmental justice communities across the state.

DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane or hydrogen investments and would enable the expansion of new large industrial carbon emitters.

I strongly urge DEQ to amend the proposed rules:

- 1) Restrict biomethane for CPP compliance to that which is produced here in Oregon and provided direct benefits for Oregonians and not allow out of state RNG credits.
- 2) Disallow hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system.
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Oregon must stay on track to achieve our climate goals! Public health, and economic development are at great risk. It's time to take a strong stand and keep the benefits here in Oregon.

Thank you for the opportunity to provide comments.  
Elliott Grey

Sent from my iPhone

**From:** rhonda I <campaigns@good.do>  
**Sent:** Friday, September 29, 2023 3:38 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP— a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18-month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system; and
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits— ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
rhonda I  
Beaverton, Oregon, 97008, United States

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no-reply address at campaigns@good.do, however rhonda provided an email address (peacepanda143@gmail.com) which we included in the REPLY-TO field.

Please reply to rhonda I at peacepanda143@gmail.com.

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<https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.dogooder.co%2F&data=05%7C01%7CClimate.2023%40stateoforegon.mail.onmicrosoft.com%7C3fb4ff88525842ea24d508dbc13cc64f%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C638316239001407821%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IklhaWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=%2FczjDyXCze5oJa7EmCvwrnn6MPZ6YgKoxMChJlhDVKQ%3D&reserved=0>

To learn more about web protocol RFC 3834 visit:

<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Ftools.ietf.org%2Fhtml%2Frfc3834&data=05%7C01%7CClimate.2023%40stateoforegon.mail.onmicrosoft.com%7C3fb4ff88525842ea24d508dbc13cc64f%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C638316239001407821%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IklhaWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=KbkDyVDeE6Kf5Whfq0Bs4eG%2BGBOhORDOI5FOSDuEQi0%3D&reserved=0>

**From:** [Beth Levin](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Friday, September 29, 2023 8:02:48 PM

---

You don't often get email from levin.beth@gmail.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

However, I was disappointed to hear that the recent rule-making table did not include community input, and also that the results lacked in meeting the plan's original goals of reducing greenhouse gas emissions by 50%, providing meaningful investments to benefit Oregonians, and holding big polluters accountable.

Therefore, I am calling on the DEQ to adapt the rules for CPP implementation to focus on the original goals of:

- 1) Reducing greenhouse gas emissions and other air pollutants, maximizing public health benefits, and minimizing costs for consumers in environmental justice and other communities in Oregon.
- 2) Keeping economic and health benefits of the Community Climate Investment program in Oregon: investments should materially benefit Oregonians at the frontlines of pollution and the climate crisis, rather than paying for cheap offsets in other places.
- 3) Achieving real reduction of emissions by 50%, rather than allowing companies to invest in biomass-derived fuels such as "renewable natural gas" (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
- 4) Holding big polluters accountable to engage in science-based "best available emissions reductions" (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.
- 5) Returning the date for a "new source" of stationary pollution to December 31, 2021.

The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
Beth Levin  
3043 NE 51st Ave  
Portland, OR 97213

**From:** [D.Young](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Friday, September 29, 2023 8:43:20 PM

---

You don't often get email from [d.josephineyoung@gmail.com](mailto:d.josephineyoung@gmail.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

The following is absolutely a script. I didn't write it. But I've read it, and I mean every word.

We cannot keep doing this. We cannot stay dependent on oil and burning this planet up to a point where life cannot be sustained. Do the right thing. Capitalism cannot be the way we die. It's pathetic, and we're smarter than this. It's time to act like it.

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

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- 3) Achieving real reduction of emissions by 50%, rather than allowing companies to invest in biomass-derived fuels such as "renewable natural gas" (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
- 4) Holding big polluters accountable to engage in science-based "best available emissions reductions" (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.

5) Returning the date for a “new source” of stationary pollution to December 31, 2021.

The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
D Young  
835 Vosburg St NW  
Salem, OR 97304

**From:** [Mary Lyn Villaume](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Friday, September 29, 2023 9:59:40 PM

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You don't often get email from [egyptredseashells@gmail.com](mailto:egyptredseashells@gmail.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

However, I was disappointed to hear that the recent rule-making table did not include community input, and also that the results lacked in meeting the plan's original goals of reducing greenhouse gas emissions by 50%, providing meaningful investments to benefit Oregonians, and holding big polluters accountable.

Therefore, I am calling on the DEQ to adapt the rules for CPP implementation to focus on the original goals of:

- 1) Reducing greenhouse gas emissions and other air pollutants, maximizing public health benefits, and minimizing costs for consumers in environmental justice and other communities in Oregon.
- 2) Keeping economic and health benefits of the Community Climate Investment program in Oregon: investments should materially benefit Oregonians at the frontlines of pollution and the climate crisis, rather than paying for cheap offsets in other places.
- 3) Achieving real reduction of emissions by 50%, rather than allowing companies to invest in biomass-derived fuels such as "renewable natural gas" (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
- 4) Holding big polluters accountable to engage in science-based "best available emissions reductions" (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.
- 5) Returning the date for a "new source" of stationary pollution to December 31, 2021.

The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
Mary Lyn Villaume  
3006 NE 16th Ave  
Portland, OR 97212

**From:** [ciri5447@everyactioncustom.com](mailto:ciri5447@everyactioncustom.com) on behalf of [Sharon E Ciri](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Saturday, September 30, 2023 6:23:26 AM

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Dear Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision-making. Careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families

and communities.

Sincerely,  
Sharon E Ciri  
6709 SE Monroe St Milwaukie, OR 97222-1939  
ciri5447@comcast.net

**From:** [Zechariah Heck](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Please strengthen proposed 2023 climate rules  
**Date:** Saturday, September 30, 2023 7:51:59 AM

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Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane or hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of “book and claim” accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

**From:** [Derek Gendvil](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Saturday, September 30, 2023 7:46:01 PM

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You don't often get email from [dgendvil@gmail.com](mailto:dgendvil@gmail.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

However, I was disappointed to hear that the recent rule-making table did not include community input, and also that the results lacked in meeting the plan's original goals of reducing greenhouse gas emissions by 50%, providing meaningful investments to benefit Oregonians, and holding big polluters accountable.

Therefore, I am calling on the DEQ to adapt the rules for CPP implementation to focus on the original goals of:

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- 3) Achieving real reduction of emissions by 50%, rather than allowing companies to invest in biomass-derived fuels such as "renewable natural gas" (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
- 4) Holding big polluters accountable to engage in science-based "best available emissions reductions" (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.
- 5) Returning the date for a "new source" of stationary pollution to December 31, 2021.

The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
Derek Gendvil  
9030 W Sahara Ave PMB 360  
Las Vegas, NV 89117

**From:** [Beth Ricketson](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Sunday, October 1, 2023 2:31:05 PM

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You don't often get email from [blicketson@gmail.com](mailto:blicketson@gmail.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

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Therefore, I am calling on the DEQ to adapt the rules for CPP implementation to focus on the original goals of:

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- 4) Holding big polluters accountable to engage in science-based "best available emissions reductions" (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.
- 5) Returning the date for a "new source" of stationary pollution to December 31, 2021.

The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
Beth Ricketson  
3414 SE 52nd Ave  
Portland, OR 97206

**From:** [Matt Solak](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment\_\_DEQ Climate 2023  
**Date:** Monday, October 2, 2023 7:01:11 AM  
**Attachments:** [PPGA Comments on OR DEQ 2023 Climate Rulemaking.pdf](#)

---

You don't often get email from matt@kdafirm.com. [Learn why this is important](#)

Please find attached comments from the Pacific Propane Gas Association.

Thank you.

Matt Solak  
Executive Director  
Pacific Propane Gas Association  
Office: 844.585.4940  
Cell: 269.470.8729



**From:** [Liz Fox](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Monday, October 2, 2023 8:17:02 AM

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You don't often get email from keokuk1956@gmail.com. [Learn why this is important](#)

The passage of the Climate Protection Plan (CPP) is an important step towards reaching our climate safety goals. As with any legislation, the success of the outcome is due to the specifics in the rule-making process.

We are very disturbed to see the make-up of the advisory committee. We note that of 14 members, only two are public interest groups and are concerned that regulated industries' input will not serve the public interest.

The current concessions to regulated industries allow out-of-state RNG bio-methane investments and could enable the expansion of new industrial emitters, defeating the goals of the CPP. The current proposed rule amendments will compromise the program's intended public health, economic, and employment goals, and hinder benefits for Oregon consumers, workers, local economies, and communities across the state.

We are also concerned that this type of out of state investment would divert money from the Community Climate Investment fund, created specifically to focus on benefits to Oregonians.

We see Northwest Natural Gas is already seeking to comply with the CPP by purchasing Renewable Thermal Certificates associated with RNG outside of Oregon. Please strengthen requirements by restricting bio-methane used for CPP compliance to that which would produce direct benefits to Oregonians.

Finally, we ask you to strengthen the emissions reduction requirements for new or expanded stationary source facilities in Oregon under the BAER Act. These large emitters must pivot to use their economic base to be part of the solution, not part of the problem.

This rule-making is vital to ensure this program stays on track to achieve its stated climate, public health, and economic goals. You are in a crucial role to make sure this actually happens.

Thank you for your attention to this matter,

Liz & Dave Fox  
POB 696  
2068 Hidden Valley Road  
Toledo, OR 97391

**From:** [Drew Simrin](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Monday, October 2, 2023 8:40:45 AM

---

You don't often get email from marioman3@gmail.com. [Learn why this is important](#)

Department of Environmental Quality,

My name is Drew and I live in Eugene.

I care deeply about our climate, and Oregon's role to lead.

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane or hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of “book and claim” accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

**From:** [Sus Barnhart](#)  
**To:** [2023 Climate - DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Monday, October 2, 2023 9:26:05 AM

You don't often get email from suebarnhart2@gmail.com. [Learn why this is important](#)

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane or hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of “book and claim” accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Thank you so much for your consideration of this important topic. The future of Oregon's people, flora and fauna relies on this important issue.

Susan Barnhart  
1439 West 4th Ave  
Eugene, OR 97402  
541-731-1189

**From:** [Linda Kelley](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Monday, October 2, 2023 11:32:03 AM

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You don't often get email from lmkelley405@gmail.com. [Learn why this is important](#)

Members of the DEQ rule making committee:

Thank you for the opportunity to submit comment. I am concerned about your rule making process as I see that the advisory committee is almost all industry. I am not confident that an industry led committee will be effective in creating rules that benefit the health and safety of Oregonians as their focus is to preserve their industries which we know must change. It is a daunting task we all face, changing everything related to our energy sourcing; but it has to be done, with knowledge that our time is very short to avert climate tipping points.

In Eugene we see how the gas industry can manipulate public opinion through large expensive campaigns to overcome our electrification ordinance, at least for the present.

The compromise to industry to allow out-of-state RNG bio-methane investments as offsets would defeat the goals of the Climate Protection Plan, which focus on direct benefits to Oregonians, it seems this would divert monies from our Community Climate Investment fund.

Northwest Natural Gas is already trying to comply with the CPP by purchasing Renewable Thermal Certificates associated with RNG outside of Oregon. Please strengthen requirements by restricting bio-methane used for CPP compliance to that which would produce direct benefits to Oregonians.

We know our energy source must pivot. I would like to strongly encourage your committee to research Geothermal opportunities as an electrical caseload option. There are 17 projects in oil and gas states. Texas is looking to begin pivoting. Oregon shows up a a prime location for a geothermal plant. There is already a small plant in eastern Oregon that Idaho benefits from.

We do not have time to fight oil and gas production. We must advocate for them to pivot their operations and begin investing in geothermal production. We also cannot afford the years that will be wasted fighting among ourselves over Small Nuclear Reactor. Geothermal is safe and fills the requirement for caseload electricity.

Our large fossil fuel emitters must pivot to use their economic base to be part of the solution, not part of the problem. There is excellent presentations on geothermal energy development on the Volts podcast of 3/31/23 and again on 7/31/23. Please research and support bringing federal funding into the state to help our utilities pivot.

Thank you for the opportunity to comment.

Linda Kelley  
1830 Arthur st.  
Eugene, OR 97405

**From:** [Erica Benedict-Barta](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Climate Protection Plan comment  
**Date:** Monday, October 2, 2023 11:39:16 AM

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You don't often get email from ebenedictbarta@gmail.com. [Learn why this is important](#)

Dear DEQ professionals,

I graduated from the UO ENV Studies program years ago and am now a mental health professional in Eugene.

It makes perfect sense that environmental degradation affects our physical and emotional lives tremendously... afterall we are not seperate from nature or each other (the world over). A strong majority of Oregonians polled are worried about climate change! By 'change' we all know that actually means 'destabilization.'

Please cut through confusion and use your voices of leadership to advocate for environmental \*caution\* by turning down the volume of outsized voices in industry! Most Oregonians don't have the capacity to track these important details but we know they're important and find out eventually whether our leadership has had our back.

I appreciate all the research and careful recommendations of Eugene's 350 group. Thanks also for what YOU do, including all that may go unrecognized to protect us.

Erica Walla  
3301 Donald St Eugene, OR

**From:** [SINGH Nicole \\* DEQ](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** FW: DEQ Rulemaking Comments  
**Date:** Monday, October 2, 2023 11:46:02 AM

---

Nicole Singh (*she/her*)  
Senior Climate Policy Advisor, Office of Greenhouse Gas Programs  
Oregon Department of Environmental Quality  
503-869-2119  
[nicole.singh@deq.oregon.gov](mailto:nicole.singh@deq.oregon.gov)

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**From:** TRAPP Lindsay \* DEQ <[lindsay.trapp@deq.oregon.gov](mailto:lindsay.trapp@deq.oregon.gov)>  
**Sent:** Monday, October 2, 2023 11:34 AM  
**To:** SINGH Nicole \* DEQ <[Nicole.SINGH@deq.oregon.gov](mailto:Nicole.SINGH@deq.oregon.gov)>  
**Subject:** FW: DEQ Rulemaking Comments

Another public comment submission below...

Hope you have a great week, Nicole!

**Lindsay Trapp** (*she/her*)  
Environmental Quality Commission Policy Analyst & Assistant  
Oregon Department of Environmental Quality  
[lindsay.trapp@deq.oregon.gov](mailto:lindsay.trapp@deq.oregon.gov)  
Cell: 971-357-4893

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**From:** Lauren Fraser <[laurenffraser@gmail.com](mailto:laurenffraser@gmail.com)>  
**Sent:** Monday, October 2, 2023 9:35 AM  
**To:** TRAPP Lindsay \* DEQ <[lindsay.trapp@deq.oregon.gov](mailto:lindsay.trapp@deq.oregon.gov)>  
**Subject:** DEQ Rulemaking Comments

You don't often get email from [laurenffraser@gmail.com](mailto:laurenffraser@gmail.com). [Learn why this is important](#)

My name is Lauren Fraser from Energize Bend, a local nonprofit supporting residential energy efficiency, renewable energy, and electrification.

Thank you Chair George and members of the commission and staff for the opportunity to provide comment on DEQ's 2023 climate rulemaking.

The Climate Protection Program is potentially one of the most significant tools that Oregon has to reduce climate pollution in our state and it has been designed to bring health and economic benefits to the residents of our state. But this program will only be effective if the details of the rules support

the purpose of the program.

**I am very concerned that DEQ's current proposed rules would effectively undermine the purpose of the CPP and I would remind the commission that this program was adopted with overwhelming public support following an extensive stakeholder engagement process and was designed to benefit the residents of Oregon.**

The proposed rules would undermine the intended objectives of the program by reducing clean energy projects built here in Oregon, meaning fewer jobs and other local economic benefits particularly for environmental justice communities across the state.

Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane or hydrogen investments and would enable the expansion of new large industrial carbon emitters.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane used for CPP compliance to that which is produced here in Oregon and provided direct benefits for Oregonians and not allow out of state RNG credits.
- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system.
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

These updates are critical to ensure that Oregon stays on track to achieve our climate goals and to maximize the associated job creation, cost saving, public health, and economic development benefits here in Oregon.

Thank you for the opportunity to provide comments.

Lauren Fraser

**From:** [R.B. Garden](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Monday, October 2, 2023 1:03:36 PM

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I'm concerned that the current concessions to regulated industries allow out-of-state RNG bio-methane investments and could enable the expansion of new large industrial emitters, defeating the goals of the Climate Protection Plan (CPP). The current proposed rule amendments will compromise the program's intended public health, economic, and employment goals, and hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I'm also concerned that this type of out of state investment would divert money from the Community Climate Investment fund, created specifically to focus on benefits to Oregonians.

Please strengthen requirements by restricting bio-methane used for CPP compliance to that which would produce direct benefits to Oregonians. Implement this Oregon program to benefit Oregonians. Oregon taxpayer money is best used to benefit companies that operate in Oregon while supporting Oregon workers and Oregon communities.

Do not bend to corporate and out-of-state pressures to bleed the Climate Protection Plan for profiting non-Oregon entities.

Rouanna Garden

Springfield, Oregon

**From:** [Thomas Ellis](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Please strengthen proposed 2023 Climate Rules  
**Date:** Monday, October 2, 2023 2:09:25 PM

---

You don't often get email from tiellis@gmail.com. [Learn why this is important](#)

To all whom it may concern in the Department of Environmental Quality:

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will ensure that our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for communities throughout Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences for communities if the CPP is weakened in response to lawsuits from corporate polluters.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and affected communities across the state. I therefore strongly urge DEQ to amend the proposed rules in the following ways

- 1) Restrict biomethane or hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and

- 2) Strengthen emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

3) Maintain protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from anthropogenic carbon sources does not comply with the CPP.

Thank you for your attention to these vital issues.

Sincerely,

Thomas I. Ellis

--

Thomas I. Ellis, Ph.D.  
4553 Fir Dell Dr SE  
Salem, OR 97302

(H) 971-701-6965

(C) 503-385-5594

Email: [tiellis@gmail.com](mailto:tiellis@gmail.com)

"Everything that lives is Holy." --William Blake

**From:** [Price, Jeremy](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Cc:** [Price, Jeremy](#)  
**Subject:** proposed rule comments  
**Date:** Monday, October 2, 2023 3:47:50 PM  
**Attachments:** [HF Sinclair - CPP Proposed Rule Comments Final.pdf](#)

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You don't often get email from [jeremy.price@hfsinclair.com](mailto:jeremy.price@hfsinclair.com). [Learn why this is important](#)

Please see HF Sinclair's public comments to the CPP Proposed Rule.

Thank you,  
Jeremy

CONFIDENTIALITY NOTICE: This e-mail, and any attachments, may contain information that is privileged and confidential. If you received this message in error, please advise the sender immediately by reply e-mail and do not retain any paper or electronic copies of this message or any attachments. Unless expressly stated, nothing contained in this message should be construed as a digital or electronic signature or a commitment to a binding agreement.

**From:** [Tom Dunn](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Rule Making  
**Date:** Monday, October 2, 2023 4:06:12 PM

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[You don't often get email from [tomdunn@hotmail.com](mailto:tomdunn@hotmail.com). Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

I'm upset that the rule making committee has a very large majority of industry members and only two public interest members. Don't be swayed by huge amounts money the "natural" ( really fossil fuel) gas industry is spending not to go green with renewables like solar, wind, and biofuels.

Sent from my iPhone

**From:** [Brad Reed](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Regarding proposed 2023 climate rules. Supporting stronger standards in key areas.  
**Date:** Monday, October 2, 2023 5:37:11 PM

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You don't often get email from [brad@buildingresilience.org](mailto:brad@buildingresilience.org). [Learn why this is important](#)

Department of Environmental Quality,

The Climate Protection Program is a historic policy achievement with a lot of potential upsides, as long as it continues to be rigorously updated and the integrity of its goals is maintained.

I'm submitting the following comments on behalf of Building Resilience – a statewide coalition of climate justice and public health, business and labor, faith and frontline communities, environmental, family, and youth organizations. Our mission is to promote access for all Oregonians to healthy, affordable, resilient homes and buildings that run on clean electricity.

One of the innovations of this program, which the Environmental Quality Commission adopted with overwhelming public support, was its focus not only on reducing greenhouse gas pollution, but to the benefit of the health and well-being of Oregonians who are harmed by fossil fuels. The program's mission is to reduce climate pollution **and** to deliver public health improvements and benefits to our local economy, with particular focus on environmental justice communities.

We're concerned that the new rules under discussion by DEQ now are too loose and may undermine the mission of delivering these multiple benefits to Oregonians– like cleaner air, good-paying jobs, and community improvement.

Specifically, DEQ is considering allowing regulated methane gas utilities to rely on out-of-state biomethane projects, thousands of miles from here, rather than local projects or Community Climate Investments to benefit the people of Oregon.

We recommend restricting biomethane and hydrogen investments to reduce fossil gas pollution to those that directly benefit Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline *within Oregon*. Additionally, we would like to see stronger guardrails in the new rules to ensure only "green" electrolytic hydrogen, made using renewable energy, is used for program compliance and more polluting sources of hydrogen are disallowed.

Doing so will help ensure Oregon achieves climate pollution reduction and will also maximize the associated job creation, cost savings, public health improvement, and economic development benefits locally.

One bright spot of the rules is the exclusion of synthetic methane as a way to comply with the program. We encourage DEQ to hold the line on that treatment.

Thank you for all you do for Oregon.

Brad Reed (he/him)  
Campaign Director  
[Building Resilience](#)

**From:** [Sally Rosenfeld](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Monday, October 2, 2023 5:52:39 PM

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You don't often get email from srosenfeldfrank@gmail.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

However, I was disappointed to hear that the recent rule-making table did not include community input, and also that the results lacked in meeting the plan's original goals of reducing greenhouse gas emissions by 50%, providing meaningful investments to benefit Oregonians, and holding big polluters accountable.

Therefore, I am calling on the DEQ to adapt the rules for CPP implementation to focus on the original goals of:

- 1) Reducing greenhouse gas emissions and other air pollutants, maximizing public health benefits, and minimizing costs for consumers in environmental justice and other communities in Oregon.
- 2) Keeping economic and health benefits of the Community Climate Investment program in Oregon: investments should materially benefit Oregonians at the frontlines of pollution and the climate crisis, rather than paying for cheap offsets in other places.
- 3) Achieving real reduction of emissions by 50%, rather than allowing companies to invest in biomass-derived fuels such as "renewable natural gas" (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
- 4) Holding big polluters accountable to engage in science-based "best available emissions reductions" (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.
- 5) Returning the date for a "new source" of stationary pollution to December 31, 2021.

The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
Sally Rosenfeld  
2881 NW WESTOVER RD  
PORTLAND, OR 97210

**From:** [Phil Houston Goldsmith](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Monday, October 2, 2023 6:27:49 PM

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You don't often get email from phil@lopqlaw.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

However, I was disappointed to hear that the recent rule-making table did not include community input, and also that the results lacked in meeting the plan's original goals of reducing greenhouse gas emissions by 50%, providing meaningful investments to benefit Oregonians, and holding big polluters accountable.

Therefore, I am calling on the DEQ to adapt the rules for CPP implementation to focus on the original goals of:

- 1) Reducing greenhouse gas emissions and other air pollutants, maximizing public health benefits, and minimizing costs for consumers in environmental justice and other communities in Oregon.
- 2) Keeping economic and health benefits of the Community Climate Investment program in Oregon: investments should materially benefit Oregonians at the frontlines of pollution and the climate crisis, rather than paying for cheap offsets in other places.
- 3) Achieving real reduction of emissions by 50%, rather than allowing companies to invest in biomass-derived fuels such as "renewable natural gas" (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
- 4) Holding big polluters accountable to engage in science-based "best available emissions reductions" (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.
- 5) Returning the date for a "new source" of stationary pollution to December 31, 2021.

The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
Phil Houston Goldsmith  
3110 NW 112th Pl  
Portland, OR 97229

**From:** [Alicia Gruber](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Monday, October 2, 2023 6:27:49 PM

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You don't often get email from gruber.alicia@gmail.com. [Learn why this is important](#)

Dear Commissioners,

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that the Department of Environmental Quality (DEQ)'s draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. For the CPP to deliver, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. Hydrogen is a leak-prone gas, and the risks of hydrogen leakage must be incorporated into our decision-making.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Best Available Emissions Reduction (BAER) assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Thank you for your consideration,

Sincerely,  
Alicia Gruber  
15428 NW Olive St  
Portland, OR 97229

**From:** [David Saul](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Monday, October 2, 2023 6:27:50 PM

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You don't often get email from d-saul@comcast.net. [Learn why this is important](#)

**DEQ must ensure the Climate Protection Program stays on track to achieve its climate goals. Do not allow regulated industry representatives to rollback or weaken the rules that have been developed during a lengthy collaborative process.**

David Saul  
285 East 47th Ave  
Eugene OR 97405

**From:** [Ellen Haney](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Monday, October 2, 2023 6:27:51 PM

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You don't often get email from ellenhaney15@gmail.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

However, I was disappointed to hear that the recent rule-making table did not include community input, and also that the results lacked in meeting the plan's original goals of reducing greenhouse gas emissions by 50%, providing meaningful investments to benefit Oregonians, and holding big polluters accountable.

Therefore, I am calling on the DEQ to adapt the rules for CPP implementation to focus on the original goals of:

- 1) Reducing greenhouse gas emissions and other air pollutants, maximizing public health benefits, and minimizing costs for consumers in environmental justice and other communities in Oregon.
- 2) Keeping economic and health benefits of the Community Climate Investment program in Oregon: investments should materially benefit Oregonians at the frontlines of pollution and the climate crisis, rather than paying for cheap offsets in other places.
- 3) Achieving real reduction of emissions by 50%, rather than allowing companies to invest in biomass-derived fuels such as "renewable natural gas" (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
- 4) Holding big polluters accountable to engage in science-based "best available emissions reductions" (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.
- 5) Returning the date for a "new source" of stationary pollution to December 31, 2021.

The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
Ellen Haney  
1831 SW Dolph St  
Portland, OR 97219

**From:** [Virginia Wiltshire-Gordon](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Monday, October 2, 2023 6:27:52 PM

---

You don't often get email from vrwg94@gmail.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

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- 2) Keeping economic and health benefits of the Community Climate Investment program in Oregon: investments should materially benefit Oregonians at the frontlines of pollution and the climate crisis, rather than paying for cheap offsets in other places.
- 3) Achieving real reduction of emissions by 50%, rather than allowing companies to invest in biomass-derived fuels such as "renewable natural gas" (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
- 4) Holding big polluters accountable to engage in science-based "best available emissions reductions" (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.
- 5) Returning the date for a "new source" of stationary pollution to December 31, 2021.

The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
Virginia Wiltshire-Gordon  
730 NE Weidler St  
Portland, OR 97232

**From:** [Alice West](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Monday, October 2, 2023 6:27:52 PM

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Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

However, I was disappointed to hear that the recent rule-making table did not include community input, and also that the results lacked in meeting the plan's original goals of reducing greenhouse gas emissions by 50%, providing meaningful investments to benefit Oregonians, and holding big polluters accountable.

Therefore, I am calling on the DEQ to adapt the rules for CPP implementation to focus on the original goals of:

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- 2) Keeping economic and health benefits of the Community Climate Investment program in Oregon: investments should materially benefit Oregonians at the frontlines of pollution and the climate crisis, rather than paying for cheap offsets in other places.
- 3) Achieving real reduction of emissions by 50%, rather than allowing companies to invest in biomass-derived fuels such as "renewable natural gas" (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
- 4) Holding big polluters accountable to engage in science-based "best available emissions reductions" (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.
- 5) Returning the date for a "new source" of stationary pollution to December 31, 2021.

The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
Alice West  
1237 SE 53rd Ave  
Portland, OR 97215

**From:** [David Funk](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program.  
**Date:** Monday, October 2, 2023 6:27:54 PM

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You don't often get email from davidfunk2@grassrootsmessage.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

The science is clear—we have less than a decade to cut greenhouse gas emissions in half to avoid catastrophic and irreversible climate impacts. Oregonians are already experiencing dangerous climate and health impacts as a result of fossil fuel use, with communities of color, low-income households, and rural communities bearing a disproportionate burden.

But Oregon hasn't done enough to lock in the emissions reductions that we know are needed to achieve critical climate goals. Our state is still 19% short of meeting our 2020 emissions reduction target, and does not have sufficient policies in place to put us on track to achieve President Biden's nationally determined contribution (NDC) commitment to cut U.S. emissions in half from 2005 levels by 2030. Without additional policies and programs in place to slash dangerous greenhouse gas emissions, Oregon will continue to fall short – putting lives and livelihoods at risk.

We need to increase our climate ambition, and we can't miss any opportunities to strengthen Oregon's climate programs. The Climate Protection Program (CPP) makes our state only the third in the nation to place an enforceable, declining cap on emissions from transportation and natural gas fuel usage. This program is critical for holding polluters accountable, and we can't accept any weakening of the CPP.

I am concerned that DEQ's draft rules will weaken Oregon's Climate Protection Program. The final rules for DEQ's Climate 2023 rulemaking must:

**ENSURE CLIMATE, ECONOMIC, AND PUBLIC HEALTH BENEFITS FOR OREGONIANS.** DEQ's draft rules will determine how biomethane and hydrogen are used for compliance with the CPP. I urge DEQ to restrict biomethane used for CPP compliance to that which produces direct benefits for Oregonians, rather than allowing natural gas companies to rely on out-of-state biomethane investments. For the CPP to deliver the climate, economic, and public health benefits that we need, we can't allow natural gas companies to rely on out-of-state biomethane projects for compliance instead of cutting pollution right here, in our home state. It's also critical that the full environmental impacts of biomethane and hydrogen fuels are reflected in compliance obligations under the CPP. Hydrogen is a leak-prone gas with a potent warming effect, and the risks of hydrogen leakage must be incorporated into our decision making. And careful accounting is needed to accurately reflect the climate impacts of biogas, which are dependent on both source and injection methods.

**REQUIRE INDUSTRIAL SOURCES OF EMISSIONS TO CUT CLIMATE POLLUTION IN LINE WITH THE CPP'S DECLINING CAP.** All large industrial emitters must be held accountable for their greenhouse gas emissions. Comprehensive coverage of climate pollution is critical, and I urge DEQ to ensure that any new stationary source or proposed modification with the potential to emit greenhouse gasses in any quantity is required to complete a best available emissions reductions (BAER) assessment. BAER assessments must be transparent, with members of the public given a meaningful opportunity to provide review and input. And

most importantly, these BAER assessments must be translated into concrete requirements to reduce emissions in line with science-based goals. Under the CPP's current approach, industrial emissions are exempted from binding emissions reduction requirements consistent with the CPP's declining emissions cap. These industrial sources are responsible for approximately 20% of Oregon's total emissions, and modeling suggests that their emissions will continue to increase over time. It's unacceptable that emissions from these sources could continue to increase under the CPP, placing Oregon's climate future at risk. DEQ must ensure industrial polluters face binding requirements to cut emissions in line with the CPP's declining cap.

This rulemaking will have important consequences for Oregon's ability to cut climate pollution and hold polluters accountable. It's essential that this rulemaking delivers a stronger CPP that prioritizes benefits for Oregon's families and communities.

Regards,  
David Funk  
30806 Blanton Rd  
Eugene, OR 97405

**From:** [murphyj](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** climate protection plan  
**Date:** Monday, October 2, 2023 6:28:16 PM

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[You don't often get email from [murphyj@uoregon.edu](mailto:murphyj@uoregon.edu). Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

it's the most important thing in the world right now. Do the right thing, please!

I'm 80 years old am horrified by what we've done, and CONTINUE DOING, to our planet! Jean Murphy, Eugene

**From:** [Tony Bellsmith](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Monday, October 2, 2023 9:26:07 PM

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You don't often get email from [tbell192@gmail.com](mailto:tbell192@gmail.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

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Therefore, I am calling on the DEQ to adapt the rules for CPP implementation to focus on the original goals of:

- 1) Reducing greenhouse gas emissions and other air pollutants, maximizing public health benefits, and minimizing costs for consumers in environmental justice and other communities in Oregon.
- 2) Keeping economic and health benefits of the Community Climate Investment program in Oregon: investments should materially benefit Oregonians at the frontlines of pollution and the climate crisis, rather than paying for cheap offsets in other places.
- 3) Achieving real reduction of emissions by 50%, rather than allowing companies to invest in biomass-derived fuels such as "renewable natural gas" (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
- 4) Holding big polluters accountable to engage in science-based "best available emissions reductions" (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.
- 5) Returning the date for a "new source" of stationary pollution to December 31, 2021.

The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
Tony Bellsmith  
3105 SE 29th Ave  
Portland, OR 97202

**From:** [Jane Stackhouse](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Tuesday, October 3, 2023 5:23:13 AM

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## DEQ and EQC Commissioners

The Climate Protection Plan is an excellent effort by DEQ to reduce climate pollution and create a healthier Oregon. I am concerned that businesses with a vested interest in keeping the status quo continue to try to weaken the rules. I urge DEQ to strengthen the Climate Protection Plan rules, close loopholes and ensure that the Community Climate Investment Program not only assists the poorest and most adversely impacted populations in Oregon but contributes significantly to reduction in greenhouse gas emissions. I know DEQ, with the direction and support of the EQC, can do this.

I lobbied hard for the Clean Energy Jobs bill that would have created a cap and invest program in Oregon thereby reducing climate pollution and providing funds for development of clean energy and harm reduction programs. I saw that polluting industries in Oregon lobbied hard against the bill. A number of these same industries are on the Rules Advisory Committee and continue to advocate for the status quo or minor changes that advance their interests and do not help solve the issue of ever increasing greenhouse gases in our atmosphere. This disregard for the health of our community and blindness to adverse consequences led me to electrify my 1925 duplex in Portland and cut the gas off at the street.

Cleanly generated electricity is one solution to emissions from transportation and buildings, the two biggest contributors to carbon emissions in Oregon. We need programs that promote clean electricity and help to build that infrastructure. I am especially frustrated with the behavior of the methane gas companies in the State of Oregon. They are, individually and collectively, fighting to keep the status quo. Any good business executive knows that when the external market shifts the business must adjust. The methane gas companies are not taking the changing market into account. They have viable business alternatives that they are not pursuing even as they advertise '*choice of fuel*' and beg customers to '*save their employees' jobs*' even as they try to increase customer costs. There will be no one to blame for the demise of the gas companies except their leadership's failure to adapt to changing energy needs.

I suppose one could argue that the market has not yet forced this change but the logical outcome of market forces has been obvious for years. It has also been obscured by direct fossil fuel company actions and advertising. Solar and wind energy is clean and becoming cheaper every year. Climate Pollution is an existential risk to all inhabitants of our planet and the situation becomes more dire every year. A future focused and ethical company would have started the transition away from fossil fuels years ago. These big polluters keep trying to prolong the process. It is the responsibility of the Department of Environmental Quality to stop them and protect our environment, health and economy.

Moreover, these companies have alternatives that could keep them in business and protect their workforce. NW Natural methane Gas, Avista, and Cascade Natural methane Gas could follow the example of the gas company in Vermont that is moving into the clean energy equipment and heat pump business [https://youtu.be/8i\\_QnOiy1eA](https://youtu.be/8i_QnOiy1eA). Forming in-ground heat pump hubs would provide extremely efficient heat pumps to neighborhoods (usually a one or

two block network) at a reasonable cost to customers and create an ongoing source of income for the company as they maintain and provide heating and cooling to the customers in the hub. Of course they would need pipefitters to create and maintain the network of pipes and heat transmitting fluids in them.

These companies have alternatives to gas to stay in business. Apparently they need DEQ and the EQC to give them the push to move forward. Please push and push hard. I, for one, will not fault the program if some of the Community Climate Investment Funds go to setting up in-ground heat pump hubs in low income neighborhoods. Rural Oregon would benefit because in-ground heat pumps operate more efficiently in cold weather than the more common air heat exchange.

Thank you for the opportunity to comment. Please make the CCP and the CCI stronger.

- No credits for out of state projects - Oregon programs should benefit Oregonians.req
- Skip the proposed renewable methane and hydrogen path.
  - Methane is methane
  - Providing electrical solutions to buildings is more efficient than using it to cleanly create hydrogen.
- Require rapid, meaningful reductions in greenhouse gas emissions.
- Help the gas companies become true innovators in providing clean energy.

Jane Stackhouse  
2133 NE Brazee Street  
Portland, OR 97212  
503.284.1049  
[jane@janestackhouse.com](mailto:jane@janestackhouse.com)

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Jane Stackhouse  
503.284.1049  
[jane@janestackhouse.com](mailto:jane@janestackhouse.com)

**From:** [Sullivan, Michael](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Cc:** [Shahumyan, Zepure \(PacifiCorp\)](#); [Satkiewicz, Patty \(PacifiCorp\)](#)  
**Subject:** Climate 2023 Questions  
**Date:** Tuesday, October 3, 2023 7:35:34 AM

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You don't often get email from michael.sullivan@pacifiCorp.com. [Learn why this is important](#)

Good morning Nicole and Elizabeth,

My name is Mike and I recently started at PacifiCorp covering GHG policy with Zepure and Patty, who are PacifiCorp's Climate 2023 advisory committee members. I have two questions regarding the Climate 2023 proposed rules released a few weeks ago.

The first is regarding the definition change under Division 215 from "air contamination resource" to "stationary source and electric power system facility." I did not see the definition change raised in prior presentations or comments so I'd like to get a better sense of whether this is just regulatory cleanup or something else. Can you provide any clarity on the change?

Also in Division 215, proposed rules add a requirement that electric companies and service providers report and identify electricity and GHG associated from net metering facilities and PURPA QFs. We will file our comments on how we think this can be best implemented but I'd like clarification on whether electric companies would report total electricity and GHGs from net metering and QFs (like [RE 39](#)) or if each resource would need to be listed and reported individually. I hope the former given the sheer number of facilities on our system but it could be read as the latter with the way it is written. Alternatively, could a large subset of customer categories (e.g. rooftop solar customers) be aggregated to a single value?

Thank you in advance for any insight you can provide. These will help steer our comments appropriately.

Best,  
Mike

Mike Sullivan  
*Pronouns: He/Him*  
Clean Energy Policy Advisor  
[Michael.Sullivan@PacifiCorp.com](mailto:Michael.Sullivan@PacifiCorp.com)



**From:** [Susan Menanno](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Tuesday, October 3, 2023 11:40:17 AM

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You don't often get email from spiritwhym@gmail.com. [Learn why this is important](#)

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To whom it may concern,

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I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they

benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,  
Susan Menanno  
15840 SE Ten Eyck Rd  
Sandy, OR 97055

**From:** [Meryl Pinque](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Tuesday, October 3, 2023 11:50:55 AM

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You don't often get email from merylpinque@gmail.com. [Learn why this is important](#)

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benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,  
Meryl Pinque  
615 Odlin Rd  
Bangor, ME 04401

**From:** [Steven Soltesz](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Tuesday, October 3, 2023 11:56:36 AM

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You don't often get email from [stsolt@gmail.com](mailto:stsolt@gmail.com). [Learn why this is important](#)

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benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,  
Steven Soltesz  
415 E 34th Pl  
Eugene, OR 97405

**From:** [Vic Bostock](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Tuesday, October 3, 2023 12:00:35 PM

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benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,  
Vic Bostock  
1612 Woodglen Ln  
Altadena, CA 91001

**From:** [David Stone](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Tuesday, October 3, 2023 12:06:18 PM

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benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

OR

Sincerely,  
David Stone  
1975 16th St.  
Springfield, OR 97477

**From:** [Frances Rove](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Tuesday, October 3, 2023 12:40:15 PM

---

You don't often get email from [frove6060@gmail.com](mailto:frove6060@gmail.com). [Learn why this is important](#)

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Thank you for the opportunity to provide comments.

KS

Sincerely,  
Frances Rove  
3404 W. 93rd St.  
Leawood, KS 66206

**From:** [Audrey Collins](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Tuesday, October 3, 2023 12:42:28 PM

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Dear 2023 DEQ Climate Rulemaking,

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Thank you for the opportunity to provide comments.

Sincerely,  
Audrey Collins  
PO BOX 1403  
Chiloquin, OR 97624

**From:** [James Mulcare](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Tuesday, October 3, 2023 12:50:28 PM

---

You don't often get email from [jmulcare52@gmail.com](mailto:jmulcare52@gmail.com). [Learn why this is important](#)

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Thank you for the opportunity to provide comments.

Sincerely,  
James Mulcare  
1110 Benjamin St  
Clarkston, WA 99403

**From:** [Dylan Plummer](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Tuesday, October 3, 2023 1:04:11 PM

---

You don't often get email from [dylanplummer310@gmail.com](mailto:dylanplummer310@gmail.com). [Learn why this is important](#)

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benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,  
Dylan Plummer  
2633 Harris St  
Eugene, OR 97405

**From:** [Lauren Magnee](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Tuesday, October 3, 2023 1:13:58 PM

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You don't often get email from [lmagnee@gmail.com](mailto:lmagnee@gmail.com). [Learn why this is important](#)

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Sincerely,  
Lauren Magnee  
7604 SE Reedway St.  
Portland, OR 97206

**From:** [Pamela Miller](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Tuesday, October 3, 2023 1:51:41 PM

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You don't often get email from pamz@pamelazmiller.com. [Learn why this is important](#)

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Thank you for the opportunity to provide comments.

TX

Sincerely,  
Pamela Miller  
6230 Thomas Court  
Tolar, TX 76476

**From:** [Drew Simrin](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Tuesday, October 3, 2023 2:01:56 PM

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You don't often get email from marioman3@gmail.com. [Learn why this is important](#)

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Sincerely,  
Drew Simrin  
104 Maynard Ave  
Eugene, OR 97404

**From:** [Jon Wood](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Tuesday, October 3, 2023 2:42:24 PM

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You don't often get email from jonxwood@earthlink.net. [Learn why this is important](#)

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Sincerely,  
Jon Wood  
1220 SW 12th Ave Apt 805  
Portland, OR 97205

**From:** [JL Angell](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Tuesday, October 3, 2023 2:42:25 PM

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You don't often get email from [jangell@earthlink.net](mailto:jangell@earthlink.net). [Learn why this is important](#)

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Sincerely,  
JL Angell  
2391 Ponderosa Rd  
Rescue, CA 95672

**From:** [Caroline Sevilla](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Tuesday, October 3, 2023 2:42:25 PM

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You don't often get email from caronyna@msn.com. [Learn why this is important](#)

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Sincerely,  
Caroline Sévilla  
All marc chagall  
Champs, NY 12345

**From:** [Raymond Valinoti](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Tuesday, October 3, 2023 2:42:26 PM

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You don't often get email from raymondva@comcast.net. [Learn why this is important](#)

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Sincerely,  
Raymond Valinoti  
16 Warren Pl  
New Providence, NJ 07974

**From:** [Melody Clarkson](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Tuesday, October 3, 2023 2:42:27 PM

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Sincerely,  
Melody Clarkson  
86083 Cherokee Dr  
Eugene, OR 97402

**From:** [Lauren Murdock](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Tuesday, October 3, 2023 2:42:29 PM

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You don't often get email from murdock\_ls@hotmail.com. [Learn why this is important](#)

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Sincerely,  
Lauren Murdock  
3940 Via Lucero Apt 16  
Santa Barbara, CA 93110

**From:** [Laura Chinofsky](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Tuesday, October 3, 2023 2:43:04 PM

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You don't often get email from lzchin@hotmail.com. [Learn why this is important](#)

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Sincerely,  
Laura Chinofsky  
422 Wendy Rd  
Southampton, PA 18966

**From:** [Katherine Bragg](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Tuesday, October 3, 2023 2:50:07 PM

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You don't often get email from braggka2@gmail.com. [Learn why this is important](#)

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Thank you for the opportunity to provide comments.

It's imperative that you don't give in the timber industry pressure. We need to take the long, inclusive view on this.

Katherine Bragg

Sincerely,  
Katherine Bragg  
2630 Tyler St  
Eugene, OR 97405

**From:** [Marcy Graham](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Tuesday, October 3, 2023 3:05:27 PM

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Thank you for the opportunity to provide comments.

Sincerely,  
Marcy Graham  
5903 Mercer Creek Dr  
Florence, OR 97439

**From:** [Benton Elliott](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Tuesday, October 3, 2023 3:25:57 PM

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You don't often get email from benton.elliott@gmail.com. [Learn why this is important](#)

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Sincerely,  
Benton Elliott  
1601 Olive St  
Eugene, OR 97401

**From:** [Tracey Aquino](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Tuesday, October 3, 2023 3:27:34 PM

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benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,  
Tracey Aquino  
3536 Virginius Dr  
Virginia Beach, VA 23452

**From:** [Pamela Reber](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Tuesday, October 3, 2023 3:39:56 PM

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You don't often get email from [pamela.reber@gmail.com](mailto:pamela.reber@gmail.com). [Learn why this is important](#)

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benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,  
Pamela Reber  
PO Box 5129  
Eugene, OR 97405

**From:** [Dianne Douglas](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Tuesday, October 3, 2023 3:47:18 PM

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You don't often get email from [dianne.douglas@asu.edu](mailto:dianne.douglas@asu.edu). [Learn why this is important](#)

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Thank you for the opportunity to provide comments.

Sincerely,  
Dianne Douglas  
2723 E Valencia Dr  
Phoenix, AZ 85042

**From:** [Tamara Bock](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Tuesday, October 3, 2023 4:30:27 PM

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You don't often get email from my.kingdom.for.a.k9@gmail.com. [Learn why this is important](#)

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Thank you for the opportunity to provide comments.

Sincerely,  
Tamara Bock  
917 Derby Lane Apt. 3  
Green Bay, WI 54301

**From:** [Richard Barker](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Tuesday, October 3, 2023 4:46:27 PM

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You don't often get email from rbarker@asu.edu. [Learn why this is important](#)

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Sincerely,  
Richard Barker  
11103 SW Davies Road  
Beaverton, OR 97007

**From:** [Janine Vinton](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Tuesday, October 3, 2023 4:56:10 PM

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You don't often get email from janine.vinton@mail.com. [Learn why this is important](#)

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Sincerely,  
Janine Vinton  
1 Walter St  
Albany, NY 12204

**From:** [Kathleen Mireault](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Tuesday, October 3, 2023 5:10:09 PM

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You don't often get email from [kathymireault2012@gmail.com](mailto:kathymireault2012@gmail.com). [Learn why this is important](#)

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Sincerely,  
Kathleen Mireault  
116 E Howard St Apt 221  
Quincy, MA 02169

**From:** [Jeffrey Levicke](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Tuesday, October 3, 2023 5:42:00 PM

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You don't often get email from jeff.levicke@gmx.com. [Learn why this is important](#)

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Sincerely,  
Jeffrey Levicke  
12445 Albers st  
V Village, CA 91607

**From:** [Ann Nowicki](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Tuesday, October 3, 2023 6:11:44 PM

---

You don't often get email from [tazzannie975@gmail.com](mailto:tazzannie975@gmail.com). [Learn why this is important](#)

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Sincerely,  
Ann Nowicki  
3355 N Delta Hwy  
Eugene, OR 97408

**From:** [Victoria \("V"\) Fells](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Wednesday, October 4, 2023 7:07:08 AM

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You don't often get email from dirtroadiva@gmail.com. [Learn why this is important](#)

Dear 2023 DEQ Climate Rulemaking,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane (aka renewable natural gas (RNG)) used for CPP compliance to that which produces direct benefits for Oregonians – projects that reduce pollution in Oregon.
- 2) Disallowing hydrogen to be used for CPP compliance unless it is green electrolytic hydrogen (made from renewable energy sources like solar and wind). Why? Not all hydrogen is created equally. Where and how it is produced and used matters significantly when it comes to emissions reduction – if it's produced from fossil fuels out-of-state, it could be more polluting than even natural gas.
- 3) Strengthening emissions reduction requirements for new or expanded large industrial facilities in Oregon under the CPP's Best Available Emissions Reduction (BAER) program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they

benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,  
Victoria ('V') Eells  
28049 Hunter Creek Road  
Gold Beach, OR 97444

**From:** [Matthew Oliphant](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Wednesday, October 4, 2023 8:37:04 AM

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You don't often get email from moliphant842@gmail.com. [Learn why this is important](#)

Dear 2023 DEQ Climate Rulemaking,

To whom it may concern,

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benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,  
Matthew Oliphant  
39 NE Cessna Dr. #2  
Bend, OR 97701

**From:** [Fauna Fauth](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Wednesday, October 4, 2023 10:58:23 AM

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You don't often get email from [fj3cats@gmail.com](mailto:fj3cats@gmail.com). [Learn why this is important](#)

Dear 2023 DEQ Climate Rulemaking,

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benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,  
Fauna Fauth  
21690 E.Beaver Creek Rd.  
Cloverdale, OR 97112

**From:** [Thomas Keys \(tkeyshike@msn.com\) Sent You a Personal Message](mailto:tkeyshike@msn.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 2:05:17 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

Thomas Keys  
1103 SE 21st Ct.  
Gresham, OR 97080  
tkeyshike@msn.com  
(503) 432-3882

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Geert Aerts \(geert.h.aerts@gmail.com\) Sent You a Personal Message](mailto:geert.h.aerts@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 2:09:49 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

No offsets!

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Geert Aerts  
30 SE 91st  
Portland, OR 97216  
[geert.h.aerts@gmail.com](mailto:geert.h.aerts@gmail.com)  
(360) 921-3476

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**From:** [Tanya Gilula \(tgilula@gmail.com\) Sent You a Personal Message](mailto:tgilula@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 2:10:42 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

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Thank you for the opportunity to provide comments.

Sincerely,

Tanya Gilula  
2316 se silver springs road  
Tanya, OR 97222  
tgilula@gmail.com  
(503) 522-6094

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Julie Buchenau \(juliebuchenau@att.net\)](mailto:juliebuchenau@att.net) Sent You a Personal Message  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 2:23:08 PM

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Thank you for the opportunity to provide comments.

Sincerely,

Julie Buchenau  
46700 Little Nestucca River Hwy  
Cloverdale, OR 97112  
juliebuchenau@att.net  
(818) 601-7452

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Andreas Moran \(andreas.moran@comcast.net\) Sent You a Personal Message](mailto:andreas.moran@comcast.net)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 2:24:14 PM

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Thank you for the opportunity to provide comments.

Sincerely,

Andreas Moran  
7440 SW Gordona Ct  
Tigard, OR 97223  
[andreas.moran@comcast.net](mailto:andreas.moran@comcast.net)  
(503) 452-2510

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Susan Wechsler \(susanwechsler@comcast.net\) Sent You a Personal Message](mailto:susanwechsler@comcast.net)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 2:24:43 PM

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Thank you for the opportunity to provide comments.

Sincerely,

Susan Wechsler  
1820 Ne Vine Avenue  
Corvallis, OR 97330  
susanwechsler@comcast.net  
(541) 757-8622

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Carol Wagner \(carol@craftedbycarol.com\) Sent You a Personal Message](mailto:carol@craftedbycarol.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 2:29:35 PM

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Thank you for the opportunity to provide comments.

Sincerely,

Carol Wagner  
350 Timber Ridge St NE , Apt 232  
Carol, OR 97322  
carol@craftedbycarol.com  
(503) 407-6726

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [PEGGY TRIBBLE \(tnt1014@aol.com\) Sent You a Personal Message](mailto:tnt1014@aol.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 2:30:18 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

No such thing as an offset.....

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Sincerely,

PEGGY TRIBBLE  
48100 SE TUMALA MOUNTAIN RD  
ESTACADA, OR 97023  
tnt1014@aol.com  
(503) 630-6914

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**From:** Lindsay Benedict <campaigns@good.do>  
**Sent:** Wednesday, October 4, 2023 2:32 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP— a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18-month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system; and
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost-saving, public health, and economic development benefits— ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Lindsay Benedict

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This email was sent by Lindsay Benedict via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic

no-reply address at campaigns@good.do, however Lindsay provided an email address (lindsaymariebenedict@gmail.com) which we included in the REPLY-TO field.

Please reply to Lindsay Benedict at lindsaymariebenedict@gmail.com.

To learn more about Do Gooder visit

<https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.dogooder.co%2F&data=05%7C01%7CClimate.2023%40stateoforegon.mail.onmicrosoft.com%7C0991671e565c461675cc08dbc5216d96%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C638320519600386006%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Iik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=ynXA8QrmpWTt6T3YM%2FM3U%2BIYdX8EBfKBQ8hXXsBAQjM%3D&reserved=0>

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**From:** Hanna Heddy <campaigns@good.do>  
**Sent:** Wednesday, October 4, 2023 2:36 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

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Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Hanna Heddy

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This email was sent by Hanna Heddy via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic

no-reply address at campaigns@good.do, however Hanna provided an email address (hannaheddy@hotmail.com) which we included in the REPLY-TO field.

Please reply to Hanna Heddy at hannaheddy@hotmail.com.

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To learn more about web protocol RFC 3834 visit:

<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Ftools.ietf.org%2Fhtml%2Frfc3834&data=05%7C01%7CClimate.2023%40stateoforegon.mail.onmicrosoft.com%7C23652c5c739d454b64c008dbc521e60b%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C638320521603296027%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Iik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=n8TjFjR8YICmWqlvrUTjN8rr96mBknArTFNg42XJmak%3D&reserved=0>

**From:** [Zenka Woolliscroft \(zenka.woolliscroft@gmail.com\) Sent You a Personal Message](mailto:zenka.woolliscroft@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 2:37:47 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Zenka Woolliscroft  
2640 SE 61st Ave  
Portland, OR 97206  
[zenka.woolliscroft@gmail.com](mailto:zenka.woolliscroft@gmail.com)  
(734) 276-7689

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**From:** [Sue Muth \(redtiger03@aol.com\) Sent You a Personal Message](mailto:redtiger03@aol.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 2:38:15 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Sue Muth  
7200 SW Manor Way  
Beaverton, OR 97078  
redtiger03@aol.com  
(503) 372-5480

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Barbara Scott-Brier \(bscottbrier@gmail.com\)](mailto:bscottbrier@gmail.com) Sent You a Personal Message  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 2:39:30 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Barbara Scott-Brier  
65 Beach Drive  
Manzanita, OR 97130  
bscottbrier@gmail.com  
(503) 201-5823

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** Maureen O'Neal <campaigns@good.do>  
**Sent:** Wednesday, October 4, 2023 2:44 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

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- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system; and
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits— ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Maureen O'Neal

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This email was sent by Maureen O'Neal via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic

no-reply address at campaigns@good.do, however Maureen provided an email address (momoneal77@gmail.com) which we included in the REPLY-TO field.

Please reply to Maureen O'Neal at momoneal77@gmail.com.

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<https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.dogooder.co%2F&data=05%7C01%7CClimate.2023%40stateoforegon.mail.onmicrosoft.com%7Cd4b29e5bc8e942f3fa1f08dbc5231e8b%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C638320526866378759%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Iik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=X8oEfgWBmYjtCbY2kIXjFoHXetwI3aAChEVn1p31r0%3D&reserved=0>

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**From:** Kate Miller <campaigns@good.do>  
**Sent:** Wednesday, October 4, 2023 2:45 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Please Act to Strengthen proposed 2023 climate rules

Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

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Thank you for the opportunity to provide comments.

Yours sincerely,  
Kate Miller

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This email was sent by Kate Miller via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic

no-reply address at campaigns@good.do, however Kate provided an email address (millerjkate@gmail.com) which we included in the REPLY-TO field.

Please reply to Kate Miller at millerjkate@gmail.com.

To learn more about Do Gooder visit

<https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.dogooder.co%2F&data=05%7C01%7CClimate.2023%40stateoforegon.mail.onmicrosoft.com%7C6f0dcd746a2847a27a7008dbc5232626%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C638320527042752163%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Iik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=ciBhG5Q9RAy702%2FkKQsW33q3GoErR9%2FtxWvGzGfV6Aw%3D&reserved=0>

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**From:** [Debra Merskin \(dmerskin@uoregon.edu\) Sent You a Personal Message](mailto:dmerskin@uoregon.edu)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 2:45:21 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

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Thank you for the opportunity to provide comments.

Sincerely,

Debra Merskin  
17348 SW Chaparral Drive  
Powell Butte, OR 97753  
dmerskin@uoregon.edu  
(541) 968-8646

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** J.S. Arquin <campaigns@good.do>  
**Sent:** Wednesday, October 4, 2023 2:49 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18-month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system; and
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
J.S. Arquin

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This email was sent by J.S. Arquin via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic

no-reply address at campaigns@good.do, however J.S. provided an email address (j\_arquin@yahoo.com) which we included in the REPLY-TO field.

Please reply to J.S. Arquin at j\_arquin@yahoo.com.

To learn more about Do Gooder visit

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**From:** Wayne Kelly <campaigns@good.do>  
**Sent:** Wednesday, October 4, 2023 2:49 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

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- 1) Restricting biomethane used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system; and
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Wayne Kelly

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This email was sent by Wayne Kelly via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic

no-reply address at campaigns@good.do, however Wayne provided an email address (waynekins@hotmail.com) which we included in the REPLY-TO field.

Please reply to Wayne Kelly at waynekins@hotmail.com.

To learn more about Do Gooder visit

<https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.dogooder.co%2F&data=05%7C01%7CClimate.2023%40stateoforegon.mail.onmicrosoft.com%7Cf23becc28ab348d085ef08dbc523c607%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C638320529677891341%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6I1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=e1sjfnWhceOyt6A5wsfkKO7XbDWVV0y4sU2PCvbABa4%3D&reserved=0>

To learn more about web protocol RFC 3834 visit:

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**From:** [Michael Noack \(rfoxcreek@peak.org\) Sent You a Personal Message](mailto:rfoxcreek@peak.org)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 2:49:33 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Michael Noack  
PO Box 923  
Waldport, OR 97394  
rfoxcreek@peak.org  
(541) 563-6636

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Miriam Landman](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Wednesday, October 4, 2023 2:52:10 PM

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You don't often get email from ml@mlandman.com. [Learn why this is important](#)

Dear 2023 DEQ Climate Rulemaking,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane (aka renewable natural gas (RNG)) used for CPP compliance to that which produces direct benefits for Oregonians – projects that reduce pollution in Oregon.
- 2) Disallowing hydrogen to be used for CPP compliance unless it is green electrolytic hydrogen (made from renewable energy sources like solar and wind). Why? Not all hydrogen is created equally. Where and how it is produced and used matters significantly when it comes to emissions reduction – if it's produced from fossil fuels out-of-state, it could be more polluting than even natural gas.
- 3) Strengthening emissions reduction requirements for new or expanded large industrial facilities in Oregon under the CPP's Best Available Emissions Reduction (BAER) program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they

benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,  
Miriam Landman  
1440 NW Highland Dr.  
Corvallis, OR 97330

**From:** [Paul Robillard \(pdr@worldwaterwatch.org\) Sent You a Personal Message](mailto:pdr@worldwaterwatch.org)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 2:53:45 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

Offsets for CO2 emissions from industry and transportation sources is essentially "greenwashing". We must mitigate CO2 emissions directly by adopting renewable energy sources and transportation systems as well as adoption of sustainable lifestyles by everyone. The climate crisis is an inter-generational problem. Leaving the planet in an uninhabitable state for our children and grandchildren is not an option. CO2 offsets are ineffective, outrageously expensive and only provide a diversion from effective climate actions.

Paul D Robillard, World Water Watch

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Paul Robillard  
5405 NW Deerfield Way  
Portland, OR 97229  
[pdr@worldwaterwatch.org](mailto:pdr@worldwaterwatch.org)  
(971) 777-0077

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Sandy Thompson \(bsand@bendbroadband.com\)](mailto:bsand@bendbroadband.com) Sent You a Personal Message  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 2:55:11 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
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I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Sandy Thompson  
1940 NW Monterey Pines Dr, Unit 1  
Bend, OR 97703  
bsand@bendbroadband.com  
(541) 550-7490

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** Richard Musser <campaigns@good.do>  
**Sent:** Wednesday, October 4, 2023 2:55 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

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- 1) Restricting biomethane used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system; and
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits— ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Richard Musser  
Vale, Oregon, 97918, United States

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This email was sent by Richard Musser via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic

no-reply address at campaigns@good.do, however Richard provided an email address (7110rwm@gmail.com) which we included in the REPLY-TO field.

Please reply to Richard Musser at 7110rwm@gmail.com.

To learn more about Do Gooder visit

<https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.dogooder.co%2F&data=05%7C01%7CClimate.2023%40stateoforegon.mail.onmicrosoft.com%7Ce3d3bd2e2479447bbd7408dbc5249309%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C638320533109291077%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Iik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=5CSkbzuog4FXZGDvIE7yVrZWJx5RdeJOq3dgg6xLwHs%3D&reserved=0>

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**From:** [Maira Domann \(mdomannpdx@gmail.com\) Sent You a Personal Message](mailto:mdomannpdx@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 2:57:34 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

Please act now! Don't let the greed of the few destroy the climate for everyone!

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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I therefore strongly urge DEQ to amend the proposed rules by:

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I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Maira Domann  
1250 Bexhill St  
West Linn, OR 97068  
mdomannpdx@gmail.com  
(503) 407-7989

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Gary Millhollen \(gmillhol@fhsu.edu\) Sent You a Personal Message](mailto:gmillhol@fhsu.edu)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 2:59:11 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Gary Millhollen  
2685 Benson Ln  
Eugene, OR 97408  
gmillhol@fhsu.edu  
(541) 343-0890

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Kay Hagen \(kprismk@aol.com\) Sent You a Personal Message](mailto:kprismk@aol.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 3:04:38 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
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I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Kay Hagen  
631 Spring Creek Dr, Ashland OR 97520  
Ashland, OR 97520  
kprismk@aol.com  
(541) 973-8657

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Jennifer Rubey-Guerreiro \(j.rubey.guerreiro@gmail.com\) Sent You a Personal Message](mailto:j.rubey.guerreiro@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 3:06:31 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Jennifer Rubey-Guerreiro  
87479 N. Star Ln., General Delivery  
Christmas Valley, OR 97641  
j.rubey.guerreiro@gmail.com  
(801) 648-4350

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** John Wadsworth <campaigns@good.do>  
**Sent:** Wednesday, October 4, 2023 3:12 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18-month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system; and
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
John Wadsworth

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This email was sent by John Wadsworth via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic

no-reply address at campaigns@good.do, however John provided an email address (johnsonwadsworth@msn.com) which we included in the REPLY-TO field.

Please reply to John Wadsworth at johnsonwadsworth@msn.com.

To learn more about Do Gooder visit

<https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.dogooder.co%2F&data=05%7C01%7CClimate.2023%40stateoforegon.mail.onmicrosoft.com%7C21a10b796a3b448a3e5b08dbc526ffdf%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C638320543536262520%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6I1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=fiSYH7EP5GpqqVdrfq3GZaAs3UiRwifn9M570RAJ7o%3D&reserved=0>

To learn more about web protocol RFC 3834 visit:

<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Ftools.ietf.org%2Fhtml%2Frfc3834&data=05%7C01%7CClimate.2023%40stateoforegon.mail.onmicrosoft.com%7C21a10b796a3b448a3e5b08dbc526ffdf%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C638320543536262520%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6I1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=AsidharCtWLwlWrnZHVxEJ1zH%2BrNJBHVuGjdjm2SQJY%3D&reserved=0>

**From:** [Kathleen Pavlick \(katpavv3@gmail.com\)](mailto:katpavv3@gmail.com) Sent You a Personal Message  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 3:15:10 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Kathleen Pavlick  
12550 SW Bexley Ln  
Tigard, OR 97224  
katpavv3@gmail.com  
(239) 560-0622

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Phil Houston Goldsmith \(phil@lopplaw.com\) Sent You a Personal Message](mailto:phil@lopplaw.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 3:15:52 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Phil Houston Goldsmith  
3110 NW 112th Place  
Portland, OR 97229  
phil@lopplaw.com  
(503) 545-9904

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Jeanne Brooks \(ms.jeanbrooks@gmail.com\)](mailto:ms.jeanbrooks@gmail.com) Sent You a Personal Message  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 3:19:01 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

Jeanne Brooks  
17232 Ivy Ln  
Sisters, OR 97759  
[ms.jeanbrooks@gmail.com](mailto:ms.jeanbrooks@gmail.com)  
(541) 382-3115

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Cherine Bauer \(cherinel@comcast.net\) Sent You a Personal Message](mailto:cherinel@comcast.net)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 3:20:59 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

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Thank you for the opportunity to provide comments.

Sincerely,

Cherine Bauer  
85 River Loop 1  
Eugene, OR 97404  
cherinel@comcast.net  
(541) 688-2065

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** Lisa Caine <campaigns@good.do>  
**Sent:** Wednesday, October 4, 2023 3:25 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18-month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

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- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system; and
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Lisa Caine  
Portland, Oregon, 97212, United States

---

This email was sent by Lisa Caine via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic

no-reply address at campaigns@good.do, however Lisa provided an email address (lcaine530@gmail.com) which we included in the REPLY-TO field.

Please reply to Lisa Caine at lcaine530@gmail.com.

To learn more about Do Gooder visit

<https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.dogooder.co%2F&data=05%7C01%7CClimate.2023%40stateoforegon.mail.onmicrosoft.com%7C32bed5f69dc848fb29e708dbc528c4d0%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C638320551124382979%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6I1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=uDvyCFcMTe2Py4NHqrUm1uq86AOkfdAhOZcljo9g%2FrE%3D&reserved=0>

To learn more about web protocol RFC 3834 visit:

<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Ftools.ietf.org%2Fhtml%2Frfc3834&data=05%7C01%7CClimate.2023%40stateoforegon.mail.onmicrosoft.com%7C32bed5f69dc848fb29e708dbc528c4d0%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C638320551124382979%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6I1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=4dGyNq5We9uhskMYxO09yGP%2BqMNJi1AlovgFkTIBfPw%3D&reserved=0>

**From:** [Robert Thornhill \(robertthornhill14@yahoo.com\) Sent You a Personal Message](mailto:robertthornhill14@yahoo.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 3:25:50 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Robert Thornhill  
13586 SE Nightingale Ave  
Happy Valley, OR 97015  
robertthornhill14@yahoo.com  
(323) 270-2022

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** Bryce Donovan <campaigns@good.do>  
**Sent:** Wednesday, October 4, 2023 3:37 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18-month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

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- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Bryce Donovan

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This email was sent by Bryce Donovan via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic

no-reply address at campaigns@good.do, however Bryce provided an email address (bryce.donovan7@gmail.com) which we included in the REPLY-TO field.

Please reply to Bryce Donovan at bryce.donovan7@gmail.com.

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**From:** Aya Vitello <campaigns@good.do>  
**Sent:** Wednesday, October 4, 2023 3:43 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

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Thank you for the opportunity to provide comments.

Yours sincerely,  
Aya Vitello  
Beaverton, Oregon, 97008, United States

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no-reply address at campaigns@good.do, however Aya provided an email address (tamiko.0531@gmail.com) which we included in the REPLY-TO field.

Please reply to Aya Vitello at tamiko.0531@gmail.com.

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**From:** [Dustin Kearns \(kearnsmdustin@gmail.com\) Sent You a Personal Message](mailto:kearnsmdustin@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 3:43:59 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Dustin Kearns  
7315 se tolman  
Portland, OR 97216  
kearnsmdustin@gmail.com  
(682) 571-4123

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Deb Carey \(boiester@gmail.com\) Sent You a Personal Message](mailto:boiester@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 3:47:13 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

Polluters instead want to win offsets for so-called "renewable" natural gas and dirty hydrogen projects sited outside of Oregon, a move that would violate commitments made when the program was created, and with other stakeholders in the CPP process.

And, of course, result in more investments in unsustainable fossil fuels.

To whom it may concern,

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Thank you for the opportunity to provide comments.

Sincerely,

Deb Carey  
1975 se crystal lake dr.  
Corvallis, OR 97333  
boiester@gmail.com  
(541) 752-0272

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**From:** [Chuck Areford](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Wednesday, October 4, 2023 3:52:20 PM

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You don't often get email from vicearoy@gmail.com. [Learn why this is important](#)

Thanks for your work. Often in the last summer and autumn, I feel trapped in my home because of poor air quality secondary to wildfires. It never used to be this way and it's happening all over the world. It's clear that we are in an environmental/climate emergency and only a quick reduction of greenhouse gas emissions can save us. It's your job to make this happen.

I have lived in Oregon for 35 years and have two sons and one grandson. I have grave concern for their future.

Fossil fuel corporations are promising one thing and doing another. They are undermining attempted regulation while increasing their output and profits. Locally, Northwest Natural promises to reduce emissions with bio-methane. Over the last three years, their emissions have increased 9%. We know that natural gas is much worse than coal for our climate.

Please do not allow any weakening of the Oregon Climate Protection Plan.

Sincerely,  
Charles Areford  
2386 Stansby Way, Eugene, OR 97405  
541-222-0241

**From:** William M. Musser IV <campaigns@good.do>  
**Sent:** Wednesday, October 4, 2023 3:57 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

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Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
William M. Musser IV

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generic no-reply address at campaigns@good.do, however William M. provided an email address (wmusseriv@icloud.com) which we included in the REPLY-TO field.

Please reply to William M. Musser IV at wmusseriv@icloud.com.

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**From:** [Barbara Buckingham-Hayes \(buckhay0139@comcast.net\) Sent You a Personal Message](mailto:buckhay0139@comcast.net)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 3:57:43 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

It is imperative that Oregon act now to make certain that the guidelines for how we view our natural resources and how we protect and preserve our environment are done with long-term vision. Short-term strategies will not create the foundation that we can depend upon for future generations, especially in light of dramatic changes in climate and the impacts of those changes on the environment and the quality of life in our communities. Corporations do not bear the brunt of the consequences when economic development is valued over the health of our ecosystems and communities. Future generations will be the ones who celebrate or mourn how the priorities were set.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Barbara Buckingham-Hayes  
3926 SE Flavel St  
Portland, OR 97202  
[buckhay0139@comcast.net](mailto:buckhay0139@comcast.net)  
(503) 349-3033

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**From:** Bleckinger Dana <campaigns@good.do>  
**Sent:** Wednesday, October 4, 2023 4:00 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

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Thank you for the opportunity to provide comments.

Yours sincerely,  
Bleckinger Dana

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no-reply address at campaigns@good.do, however Bleckinger provided an email address (dbleckinger@yahoo.com) which we included in the REPLY-TO field.

Please reply to Bleckinger Dana at dbleckinger@yahoo.com.

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**From:** [Dana Weintraub \(mrdanaweintraub@tutanota.com\)](mailto:mrdanaweintraub@tutanota.com) Sent You a Personal Message  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 4:09:34 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Dana Weintraub  
17124 SW Marty Ln  
Beaverton, OR 97003  
mrdanaweintraub@tutanota.com  
(503) 591-9470

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Renee Windsor-White \(kodiwolf1@gmail.com\) Sent You a Personal Message](mailto:kodiwolf1@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 4:15:32 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Renee Windsor-White  
490 West Ash Street  
Lebanon, OR 97355  
kodiwolf1@gmail.com  
(541) 979-1952

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Sue Ann Moore \(mooresam2015@gmail.com\) Sent You a Personal Message](mailto:mooresam2015@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 4:18:47 PM

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To whom it may concern,

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Thank you for the opportunity to provide comments.

Sincerely,

Sue Ann Moore  
11024 Little River Rd  
Glide, OR 97443  
mooresam2015@gmail.com  
(541) 860-8368

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Scott Kennedy \(tykieh@comcast.net\) Sent You a Personal Message](mailto:tykieh@comcast.net)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 4:28:35 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

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Thank you for the opportunity to provide comments.

Sincerely,

Scott Kennedy  
6027 Sir Lancelot Ct NE  
Scott, OR 97303  
tykieh@comcast.net  
(503) 507-3178

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** Lynn Cardiff <campaigns@good.do>  
**Sent:** Wednesday, October 4, 2023 4:37 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP— a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18-month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system; and
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits— ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Lynn Cardiff  
Salem, Oregon, 97301, United States

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This email was sent by Lynn Cardiff via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic

no-reply address at campaigns@good.do, however Lynn provided an email address (lcardiff@comcast.net) which we included in the REPLY-TO field.

Please reply to Lynn Cardiff at lcardiff@comcast.net.

To learn more about Do Gooder visit

<https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.dogooder.co%2F&data=05%7C01%7CClimate.2023%40stateoforegon.mail.onmicrosoft.com%7Cdd051345318541137ac908dbc532e0b0%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C638320594541744951%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Iik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=2vpawkRFiBe5%2B63hleBwjcn9rFUxDPWPYjiMk9VmgpU%3D&reserved=0>

To learn more about web protocol RFC 3834 visit:

<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Ftools.ietf.org%2Fhtml%2Frfc3834&data=05%7C01%7CClimate.2023%40stateoforegon.mail.onmicrosoft.com%7Cdd051345318541137ac908dbc532e0b0%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C638320594541744951%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Iik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=FkAoXG7R%2F%2F%2BhiEreZO2LJDu7KRso3A6t0Z40PVvF7Ec%3D&reserved=0>

**From:** [LeAnn Pinniger Magee \(lepermag@gmail.com\) Sent You a Personal Message](mailto:lepermag@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 4:40:36 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

I witnessed the incredible lack of conviction by the DEQ in the Deep South, where adherence to state policies was often lax, and the meaning of "environmental quality" was lost. Please prove that Oregon can maintain our credibility and determination as a green, ecologically sound, environment. Do your jobs, DEQ!

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking "if done well" will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
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I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

LeAnn Pinniger Magee  
6607 SW Florence Lane  
LeAnn, OR 97223  
lepermag@gmail.com  
(985) 205-2261

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415)

977-5673.

**From:** Roger Knudson <campaigns@good.do>  
**Sent:** Wednesday, October 4, 2023 4:41 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18-month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

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Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Roger Knudson  
Eugene, Oregon, 97405, United States

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This email was sent by Roger Knudson via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic

no-reply address at campaigns@good.do, however Roger provided an email address (rogerknudson@gmail.com) which we included in the REPLY-TO field.

Please reply to Roger Knudson at rogerknudson@gmail.com.

To learn more about Do Gooder visit

<https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.dogooder.co%2F&data=05%7C01%7CClimate.2023%40stateoforegon.mail.onmicrosoft.com%7Cdd1e186de6264a9b5ef508dbc5336450%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C638320596759613158%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Iik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=YfEYIE4RnX6CXh07civcWgJiZxgjuh0y1T9%2F3RBGkEI%3D&reserved=0>

To learn more about web protocol RFC 3834 visit:

<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Ftools.ietf.org%2Fhtml%2Frfc3834&data=05%7C01%7CClimate.2023%40stateoforegon.mail.onmicrosoft.com%7Cdd1e186de6264a9b5ef508dbc5336450%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C638320596759769360%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Iik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=lrEgcebe8QAevKlewB0mjjATUTcLuqnIarZNWLhYCww%3D&reserved=0>

**From:** [Bill Gilmore \(bill@bsgilmore.com\) Sent You a Personal Message](mailto:bill@bsgilmore.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 4:50:26 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Bill Gilmore  
2702 NW Cannon Way  
Portland, OR 97229  
bill@bsgilmore.com  
(503) 555-1212

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Gerry Keener \(gerrkeen@gmail.com\) Sent You a Personal Message](mailto:gerrkeen@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 4:50:32 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

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As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Gerry Keener  
1034 Custer Ct  
Eugene, OR 97404  
gerrkeen@gmail.com  
(541) 688-3868

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Anthony Albert \(albert2910@msn.com\) Sent You a Personal Message](mailto:albert2910@msn.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 5:00:30 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Anthony Albert  
285 NW 35th St  
Corvallis, OR 97330  
albert2910@msn.com  
(541) 753-2910

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Alan Bartl \(abartl@sonic.net\) Sent You a Personal Message](mailto:abartl@sonic.net)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 5:01:46 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

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Thank you for the opportunity to provide comments.

Sincerely,

Alan Bartl  
1372 Washington  
Alan, OR 97420  
abartl@sonic.net  
(707) 525-8673

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** Linda Perrine <campaigns@good.do>  
**Sent:** Wednesday, October 4, 2023 5:08 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18-month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system; and
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Linda Perrine

---

This email was sent by Linda Perrine via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic

no-reply address at campaigns@good.do, however Linda provided an email address (laperrine@gmail.com) which we included in the REPLY-TO field.

Please reply to Linda Perrine at laperrine@gmail.com.

To learn more about Do Gooder visit

<https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.dogooder.co%2F&data=05%7C01%7CClimate.2023%40stateoforegon.mail.onmicrosoft.com%7C9b321be8383e435ca98708dbc5372fd0%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C638320613069849726%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Iik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=B3Vh6khKOx2TWIIO5P7W6nZqcMhIX65wwC21ngDDWiI%3D&reserved=0>

To learn more about web protocol RFC 3834 visit:

<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Ftools.ietf.org%2Fhtml%2Frfc3834&data=05%7C01%7CClimate.2023%40stateoforegon.mail.onmicrosoft.com%7C9b321be8383e435ca98708dbc5372fd0%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C638320613069849726%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Iik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=CwfAWO7Cb%2B%2FyqUfEmUvLrd55AaGb8UEcnT6zh382CIU%3D&reserved=0>

**From:** Daniel Smith <campaigns@good.do>  
**Sent:** Wednesday, October 4, 2023 5:22 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

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Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Daniel Smith

---

This email was sent by Daniel Smith via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic

no-reply address at campaigns@good.do, however Daniel provided an email address (danielhome@san.rr.com) which we included in the REPLY-TO field.

Please reply to Daniel Smith at danielhome@san.rr.com.

To learn more about Do Gooder visit

<https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.dogooder.co%2F&data=05%7C01%7CClimate.2023%40stateoforegon.mail.onmicrosoft.com%7C4924e64e5ca14996f82108dbc539143b%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C638320621168648246%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Iik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=v%2FB9OztMAhZn9db0soGAeZmmYBkfmwB8aw37K3DI2HI%3D&reserved=0>

To learn more about web protocol RFC 3834 visit:

<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Ftools.ietf.org%2Fhtml%2Frfc3834&data=05%7C01%7CClimate.2023%40stateoforegon.mail.onmicrosoft.com%7C4924e64e5ca14996f82108dbc539143b%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C638320621168648246%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Iik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=WJidcsFxBkzql%2FZVDhjanHfjcx%2FHxy2VC34SsqEaThM%3D&reserved=0>

**From:** [Mary Lyda \(cere7email@gmail.com\) Sent You a Personal Message](mailto:cere7email@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 5:30:55 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Mary Lyda  
P.O.Box 558  
Cave Junction, OR 97523  
[cere7email@gmail.com](mailto:cere7email@gmail.com)  
(541) 415-0767

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Drew Barowicz \(dbarowicz850@yahoo.com\) Sent You a Personal Message](mailto:dbarowicz850@yahoo.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 5:38:50 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

2023 Climate Rulemaking

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Drew Barowicz  
521 NE 74th Ave  
Portland, OR 97213  
dbarowicz850@yahoo.com  
(206) 548-2500

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Shelly Dicks \(shellydicks@gmail.com\) Sent You a Personal Message](mailto:shellydicks@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 5:40:21 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

Please stop the fossil fuel industry from paying to pollute, and instead create real requirements to transition our State to clean, renewable energy! Our future depends on it!

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Shelly Dicks  
326 Foxtail Drive  
Eugene, OR 97405  
[shellydicks@gmail.com](mailto:shellydicks@gmail.com)  
(505) 227-9678

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Andrew Kossoy \(andykossoy@gmail.com\) Sent You a Personal Message](mailto:andykossoy@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 5:42:54 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Andrew Kossoy  
925 22nd Street  
Springfield, OR 97477  
andykossoy@gmail.com  
(541) 520-3758

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Patrick Leshner \(newdaypl@yahoo.com\) Sent You a Personal Message](mailto:newdaypl@yahoo.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 5:43:22 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Patrick Leshner  
150 SW Monroe Ave Apt 310  
Corvallis, OR 97333  
newdaypl@yahoo.com  
(541) 250-1017

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [NORMAN LEWIS \(norm\\_lewis@comcast.net\) Sent You a Personal Message](mailto:norm_lewis@comcast.net)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 5:44:14 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

NORMAN LEWIS  
3876 Monroe St  
Eugene, OR 97405  
norm\_lewis@comcast.net  
(541) 342-7387

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Nancy Carl \(dlnlcarl2@gmail.com\)](mailto:dlnlcarl2@gmail.com) Sent You a Personal Message  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 5:52:49 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Nancy Carl  
1014 S Park St  
Carlton, OR 97111  
[dlnlcarl2@gmail.com](mailto:dlnlcarl2@gmail.com)  
(503) 852-0029

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**From:** Jonathan Lee <campaigns@good.do>  
**Sent:** Wednesday, October 4, 2023 5:53 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

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By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

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Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,  
Jonathan Lee

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no-reply address at campaigns@good.do, however Jonathan provided an email address (jontoshiolee@gmail.com) which we included in the REPLY-TO field.

Please reply to Jonathan Lee at jontoshiolee@gmail.com.

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**From:** [Ann Nowicki \(tazzannie975@gmail.com\) Sent You a Personal Message](mailto:tazzannie975@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 5:56:12 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

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Thank you for the opportunity to provide comments.

Sincerely,

Ann Nowicki  
3355 N Delta Hwy, Unit 170  
Eugene, OR 97408  
[tazzannie975@gmail.com](mailto:tazzannie975@gmail.com)  
(791) 671-3240

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**From:** Judy Wilcox <campaigns@good.do>  
**Sent:** Wednesday, October 4, 2023 6:13 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

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Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits— ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Judy Wilcox

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no-reply address at campaigns@good.do, however Judy provided an email address (judytaylorwilcox@comcast.net) which we included in the REPLY-TO field.

Please reply to Judy Wilcox at judytaylorwilcox@comcast.net.

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**From:** [Mary Thiel \(mjthiel1090@gmail.com\) Sent You a Personal Message](mailto:mjthiel1090@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 6:14:08 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

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Thank you for the opportunity to provide comments.

Sincerely,

Mary Thiel  
6816 SE 86th Ave  
Portland, OR 97266  
[mjthiel1090@gmail.com](mailto:mjthiel1090@gmail.com)  
(951) 288-8256

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**From:** [Victoria Meier \(meier235@gmail.com\) Sent You a Personal Message](mailto:meier235@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 6:22:49 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

The handwriting is on the wall. In fact, it's all over all the walls heading out the door and down the sidewalk to where we can all see with our own eyes the damage that has been done to our state. Our forests are suffering in the heat, our rivers are more polluted than they were in the 70s, fewer and fewer salmon make it up the rivers to spawn...but wait! We all know all this already. The question is, do we have the will to see that fossil fuel industries in Oregon do not slide through loopholes.

To whom it may concern,

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Thank you for the opportunity to provide comments.

Sincerely,

Victoria Meier  
4669 Exeter Street  
West Linn, OR 97068  
meier235@gmail.com  
(503) 656-8612

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** Jenna Ayers <campaigns@good.do>  
**Sent:** Wednesday, October 4, 2023 6:25 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

My name is Jenna Ayers. I am in my last year of law school to go into environmental law to fight for the future of our planet. Growing up, I was shielded from the realities of the climate crisis, until a few years ago when my whole world changed.

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

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Thank you for the opportunity to provide comments.

Yours sincerely,  
Jenna Ayers

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Please reply to Jenna Ayers at ayers\_jenna@hotmail.com.

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**From:** [Mary Buckley \(mfbuckley@sbcglobal.net\) Sent You a Personal Message](mailto:mfbuckley@sbcglobal.net)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 6:27:42 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

Mary Buckley  
6525 NE 36th Ave  
Portland, OR 97211  
mfbuckley@sbcglobal.net  
(503) 282-2590

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**From:** Sue Leonetti <campaigns@good.do>  
**Sent:** Wednesday, October 4, 2023 6:30 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

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- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system; and
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Sue Leonetti  
Veneta, Oregon, 97487, United States

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This email was sent by Sue Leonetti via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic

no-reply address at campaigns@good.do, however Sue provided an email address (tleonetti3@gmail.com) which we included in the REPLY-TO field.

Please reply to Sue Leonetti at tleonetti3@gmail.com.

To learn more about Do Gooder visit

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To learn more about web protocol RFC 3834 visit:

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**From:** [Debra Saude \(deanndeb@centurytel.net\) Sent You a Personal Message](mailto:deanndeb@centurytel.net)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 6:54:43 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Debra Saude  
1910 NE 21st street  
Debra, OR 97367  
deanndeb@centurytel.net  
(541) 557-9446

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Dena Turner](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Wednesday, October 4, 2023 6:56:06 PM

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You don't often get email from denaturn62@gmail.com. [Learn why this is important](#)

Dear 2023 DEQ Climate Rulemaking,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane (aka renewable natural gas (RNG)) used for CPP compliance to that which produces direct benefits for Oregonians – projects that reduce pollution in Oregon.
- 2) Disallowing hydrogen to be used for CPP compliance unless it is green electrolytic hydrogen (made from renewable energy sources like solar and wind). Why? Not all hydrogen is created equally. Where and how it is produced and used matters significantly when it comes to emissions reduction – if it's produced from fossil fuels out-of-state, it could be more polluting than even natural gas.
- 3) Strengthening emissions reduction requirements for new or expanded large industrial facilities in Oregon under the CPP's Best Available Emissions Reduction (BAER) program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they

benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,  
Dena Turner  
1122 SE 60th Ave  
Portland, OR 97215

**From:** [Dawn Albanese](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Wednesday, October 4, 2023 6:56:30 PM

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Dear 2023 DEQ Climate Rulemaking,

To whom it may concern,

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I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane (aka renewable natural gas (RNG)) used for CPP compliance to that which produces direct benefits for Oregonians – projects that reduce pollution in Oregon.
- 2) Disallowing hydrogen to be used for CPP compliance unless it is green electrolytic hydrogen (made from renewable energy sources like solar and wind). Why? Not all hydrogen is created equally. Where and how it is produced and used matters significantly when it comes to emissions reduction – if it's produced from fossil fuels out-of-state, it could be more polluting than even natural gas.
- 3) Strengthening emissions reduction requirements for new or expanded large industrial facilities in Oregon under the CPP's Best Available Emissions Reduction (BAER) program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they

benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,  
Dawn Albanese  
156 Basswood Drive  
Elk Grove Village, IL 60007

**From:** [Maryann Staron](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Wednesday, October 4, 2023 6:56:31 PM

---

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Dear 2023 DEQ Climate Rulemaking,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane (aka renewable natural gas (RNG)) used for CPP compliance to that which produces direct benefits for Oregonians – projects that reduce pollution in Oregon.
- 2) Disallowing hydrogen to be used for CPP compliance unless it is green electrolytic hydrogen (made from renewable energy sources like solar and wind). Why? Not all hydrogen is created equally. Where and how it is produced and used matters significantly when it comes to emissions reduction – if it's produced from fossil fuels out-of-state, it could be more polluting than even natural gas.
- 3) Strengthening emissions reduction requirements for new or expanded large industrial facilities in Oregon under the CPP's Best Available Emissions Reduction (BAER) program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they

benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,  
Maryann Staron  
4541 W 88th St  
Hometown, IL 60456

**From:** [Saran K.](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Wednesday, October 4, 2023 6:56:31 PM

---

You don't often get email from sarank@mac.com. [Learn why this is important](#)

Dear 2023 DEQ Climate Rulemaking,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane (aka renewable natural gas (RNG)) used for CPP compliance to that which produces direct benefits for Oregonians – projects that reduce pollution in Oregon.
- 2) Disallowing hydrogen to be used for CPP compliance unless it is green electrolytic hydrogen (made from renewable energy sources like solar and wind). Why? Not all hydrogen is created equally. Where and how it is produced and used matters significantly when it comes to emissions reduction – if it's produced from fossil fuels out-of-state, it could be more polluting than even natural gas.
- 3) Strengthening emissions reduction requirements for new or expanded large industrial facilities in Oregon under the CPP's Best Available Emissions Reduction (BAER) program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they

benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,  
Saran K.  
1710 Bagley  
Los Angeles, CA 90035

**From:** [Dawn Albanese](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Wednesday, October 4, 2023 6:56:34 PM

---

You don't often get email from dawnie\_angel@hotmail.com. [Learn why this is important](#)

Dear 2023 DEQ Climate Rulemaking,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,  
Dawn Albanese  
156 Basswood Drive  
Elk Grove Village, IL 60007

**From:** [Bonnie Faith](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Wednesday, October 4, 2023 6:56:34 PM

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Dear 2023 DEQ Climate Rulemaking,

To whom it may concern,

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benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,  
Bonnie Faith  
290A Washington Street  
Cambridge, MA 02139

**From:** [Diane Bolte-Silverman](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Wednesday, October 4, 2023 6:56:35 PM

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You don't often get email from boltesilverman@comcast.net. [Learn why this is important](#)

Dear 2023 DEQ Climate Rulemaking,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

We believe that Oregon's CCP mission of achieving our state's climate goals and other positive benefits must continue be its top priority, and thus all rules regulating pollution by fossil fuel companies need to be maintained or strengthened.

Sincerely,  
Diane Bolte-Silverman  
2555 Central Blvd.  
Eugene, OR 97403

**From:** [Melba Dlugonski](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Wednesday, October 4, 2023 6:56:36 PM

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Dear 2023 DEQ Climate Rulemaking,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,  
Melba Dlugonski  
6735 SE 78th Ave  
Portland, OR 97206

**From:** [Philip Ratcliff](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Wednesday, October 4, 2023 6:56:56 PM

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Dear 2023 DEQ Climate Rulemaking,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,  
Philip Ratcliff  
4665 Tragen Ct SE  
Salem, OR 97302

**From:** [Laurie Fox](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Wednesday, October 4, 2023 6:57:01 PM

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Dear 2023 DEQ Climate Rulemaking,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane (aka renewable natural gas (RNG)) used for CPP compliance to that which produces direct benefits for Oregonians – projects that reduce pollution in Oregon.
- 2) Disallowing hydrogen to be used for CPP compliance unless it is green electrolytic hydrogen (made from renewable energy sources like solar and wind). Why? Not all hydrogen is created equally. Where and how it is produced and used matters significantly when it comes to emissions reduction – if it's produced from fossil fuels out-of-state, it could be more polluting than even natural gas.
- 3) Strengthening emissions reduction requirements for new or expanded large industrial facilities in Oregon under the CPP's Best Available Emissions Reduction (BAER) program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they

benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,  
Laurie Fox  
415 N Main St  
Drain, OR 97435

**From:** Betty Shelley <campaigns@good.do>  
**Sent:** Wednesday, October 4, 2023 6:58 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18-month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system; and
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Betty Shelley

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This email was sent by Betty Shelley via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic

no-reply address at campaigns@good.do, however Betty provided an email address (greenhouseone@gmail.com) which we included in the REPLY-TO field.

Please reply to Betty Shelley at greenhouseone@gmail.com.

To learn more about Do Gooder visit

<https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.dogooder.co%2F&data=05%7C01%7CClimate.2023%40stateoforegon.mail.onmicrosoft.com%7C84ace51787bf438133fc08dbc54674e5%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C638320678665228120%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Iik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=Qq3nLv2BUqscfQRnKO07KhIZiHWPfZeSCfd36j7eOM%3D&reserved=0>

To learn more about web protocol RFC 3834 visit:

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**From:** [Edwin W Moore IV \(edwin.moore@comcast.net\) Sent You a Personal Message](mailto:edwin.moore@comcast.net)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 7:06:23 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Edwin W Moore IV  
6550 B St  
Springfield, OR 97478  
edwin.moore@comcast.net  
(541) 729-5974

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** Dana L Petre-Miller <campaigns@good.do>  
**Sent:** Wednesday, October 4, 2023 7:09 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

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- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system; and
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Dana L Petre-Miller  
Petre-Miller  
Keizer, Oregon, 97303, United States

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This email was sent by Dana L Petre-Miller via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our

generic no-reply address at campaigns@good.do, however Dana L provided an email address (mraltogether@comcast.net) which we included in the REPLY-TO field.

Please reply to Dana L Petre-Miller at mraltogether@comcast.net.

To learn more about Do Gooder visit

<https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.dogooder.co%2F&data=05%7C01%7CClimate.2023%40stateoforegon.mail.onmicrosoft.com%7C70cb7f4309304deb769608dbc5481af2%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C638320685710785821%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Iik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=WiDz1J59YrxgGUbhPKNlxAhm%2F0QWQclA6CW87MmX4%2BE%3D&reserved=0>

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**From:** [jennifer manning \(jennman30@gmail.com\) Sent You a Personal Message](mailto:jennman30@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 7:21:44 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

Oregon needs help cooling down in the summer to prevent wildfires!

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

jennifer manning  
91556 donna rd  
spfd, OR 97478  
[jennman30@gmail.com](mailto:jennman30@gmail.com)  
(541) 606-3878

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Barrett Edgar \(seacliff4@gmail.com\) Sent You a Personal Message](mailto:seacliff4@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 7:30:13 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Barrett Edgar  
PO Box 210  
Wedderburn, OR 97491  
seacliff4@gmail.com  
(541) 247-2575

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Ted Magnuson \(twmagnuson@gmail.com\)](mailto:twmagnuson@gmail.com) Sent You a Personal Message  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 7:35:35 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

It is heartbreaking to see our forests on fire and the brief blue skies of our summer degraded by smog and smoke. Green energy should be encouraged. Fossil fuels discouraged

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Ted Magnuson  
14405 SW High Tor Drive  
Portland, OR 97224  
[twmagnuson@gmail.com](mailto:twmagnuson@gmail.com)  
(503) 590-0086

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Monica Gilman \(monicagilman@yahoo.com\) Sent You a Personal Message](mailto:monicagilman@yahoo.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 7:37:13 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Monica Gilman  
25525 , S. Laura Ln  
Estacada, OR 97023  
monicagilman@yahoo.com  
(503) 630-4683

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Beeara Edmonds \(beeara@beeara.com\) Sent You a Personal Message](mailto:beeara@beeara.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 7:44:42 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

Please don't compromise the well-being of our environment. Stand firm and don't cave in to the fossil fuel industry.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Beeara Edmonds  
2017 SE Stone St  
Corvallis, OR 97333  
beeara@beeara.com  
(541) 321-0434

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [William M. Musser IV \(wmusseriv@icloud.com\) Sent You a Personal Message](mailto:wmusseriv@icloud.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 7:44:45 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

William M. Musser IV  
3225 NE 29th Ave  
Portland, OR 97212  
wmusseriv@icloud.com  
(303) 549-0938

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Helen Moissant \(hmoissant@aol.com\) Sent You a Personal Message](mailto:hmoissant@aol.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 8:08:56 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

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- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Helen Moissant  
2965 Ross Lane  
Helen, OR 97502  
hmoissant@aol.com  
(541) 973-2828

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Heather Dale \(arydonis@hotmail.com\) Sent You a Personal Message](mailto:arydonis@hotmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 8:09:40 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Heather Dale  
26761 SW 45th Dr  
Wilsonville, OR 97070  
arydonis@hotmail.com  
(503) 682-7217

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** Derek Severson <campaigns@good.do>  
**Sent:** Wednesday, October 4, 2023 8:59 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ well knows, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the Climate Protection Program which is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18-month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon. This is unacceptable.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system; and
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Derek D. Severson

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This email was sent by Derek Severson via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic

no-reply address at campaigns@good.do, however Derek provided an email address (derekseverson@msn.com) which we included in the REPLY-TO field.

Please reply to Derek Severson at derekseverson@msn.com.

To learn more about Do Gooder visit

<https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.dogooder.co%2F&data=05%7C01%7CClimate.2023%40stateoforegon.mail.onmicrosoft.com%7C49b2b8aac1f443fac47c08dbc557600c%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C638320751321213121%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Iik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=1bdjcpXH58B4ToicuXm%2BihSQH2CTEe3YsvDhYtW1ms%3D&reserved=0>

To learn more about web protocol RFC 3834 visit:

<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Ftools.ietf.org%2Fhtml%2Frfc3834&data=05%7C01%7CClimate.2023%40stateoforegon.mail.onmicrosoft.com%7C49b2b8aac1f443fac47c08dbc557600c%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C638320751321213121%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Iik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=6TiwTZY%2BjLNfFeBHRi4qf2HyokWZMH9i1KAv%2BKNkcc0%3D&reserved=0>

**From:** [Carol Moore \(carol\\_m\\_moore@yahoo.com\) Sent You a Personal Message](mailto:carol_m_moore@yahoo.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 9:01:57 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

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- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Carol Moore  
14280 SW Stallion Dr.  
Beaverton, OR 97008  
carol\_m\_moore@yahoo.com  
(503) 939-4814

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Renee Klein \(renee\\_klein@hotmail.com\) Sent You a Personal Message](mailto:renee_klein@hotmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 9:50:05 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

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I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Renee Klein  
4732 la villa marina  
Renee, CA 90292  
[renee\\_klein@hotmail.com](mailto:renee_klein@hotmail.com)  
(310) 827-1505

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.



**From:** [David Sweet \(davidpsweet@hotmail.com\) Sent You a Personal Message](mailto:David Sweet (davidpsweet@hotmail.com) Sent You a Personal Message)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 9:57:25 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

David Sweet  
4810 NE Sandy Blvd., Apt.101  
Portland, OR 97213  
davidpsweet@hotmail.com  
(503) 201-4000

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Jaime Ramirez \(yunohuayam@yahoo.com\) Sent You a Personal Message](mailto:yunohuayam@yahoo.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 10:41:00 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Jaime Ramirez  
1213 Jackson Street  
Corvallis, OR 97330  
yunohuayam@yahoo.com  
(541) 758-3259

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Carolyn Eckel \(tlew4002@earthlink.net\) Sent You a Personal Message](mailto:tlew4002@earthlink.net)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 11:19:05 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

There needs to be strict regulation of pollution to protect everyone's health.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Carolyn Eckel  
18542 NE Wasco  
Portland, OR 97230  
tlew4002@earthlink.net  
(971) 274-3997

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Eddie Guilherme \(tribalcolors@gmail.com\) Sent You a Personal Message](mailto:Eddie.Guilherme@tribalcolors@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 11:20:26 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

Every thing that you do should be respected and honored, because it shows that you all Sierra Club members care about our great Country. So, thank you so much for all you do!!!

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

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Thank you for the opportunity to provide comments.

Sincerely,

Eddie Guilherme  
1295 S. 57th pl.  
Springfield, OR 97478  
tribalcolors@gmail.com  
(541) 799-6037

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Wade Stoddard \(wadestoddard@yahoo.com\) Sent You a Personal Message](mailto:wadestoddard@yahoo.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 4, 2023 11:32:18 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Wade Stoddard  
4105 N Massachusetts Ave  
North Portland, OR 97217  
wadestoddard@yahoo.com  
(503) 975-2918

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [George Snipes \(gscrooge@bluetiehome.com\) Sent You a Personal Message](mailto:gscrooge@bluetiehome.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, October 5, 2023 1:30:06 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

George Snipes  
6934 Southeast 45th Avenue  
Portland, OR 97206  
gscrooge@bluetiehome.com  
(503) 774-3394

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Sarah Paige \(paige.sarah@gmail.com\) Sent You a Personal Message](mailto:paige.sarah@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, October 5, 2023 1:50:34 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Sarah Paige  
5015 Nectar Way  
Eugene, OR 97405  
[paige.sarah@gmail.com](mailto:paige.sarah@gmail.com)  
(530) 413-3232

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Dr. John Gardiner \(john.l.gardiner@gmail.com\) Sent You a Personal Message](mailto:john.l.gardiner@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, October 5, 2023 4:39:33 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

I am a retired Professional Engineer with a lifetime of involvement with every aspect of river basin management and restoration, achieving remarkable results in wildlife-friendly river restoration on West Coast streams. I have also been a University Professor in London, specializing in sustainability issues with special reference to rivers, Climate change is an existential threat to humankind as well as wildlife, which is suffering from savagely high extinction rates, Oregon stands at a crossroads; sticking to the CPP may stave off greatly worsening conditions (wildfire, floods, landslides etc) but weakening this resolve to actually tackle climate change will be disastrous.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Dr. John Gardiner  
PO Box 2451  
Cave Junction, OR 97523  
[john.l.gardiner@gmail.com](mailto:john.l.gardiner@gmail.com)  
(541) 415-2613

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Joyce Coogan](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, October 5, 2023 6:01:41 AM

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You don't often get email from jjcoogan18@gmail.com. [Learn why this is important](#)

Dear 2023 DEQ Climate Rulemaking,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane (aka renewable natural gas (RNG)) used for CPP compliance to that which produces direct benefits for Oregonians – projects that reduce pollution in Oregon.
- 2) Disallowing hydrogen to be used for CPP compliance unless it is green electrolytic hydrogen (made from renewable energy sources like solar and wind). Why? Not all hydrogen is created equally. Where and how it is produced and used matters significantly when it comes to emissions reduction – if it's produced from fossil fuels out-of-state, it could be more polluting than even natural gas.
- 3) Strengthening emissions reduction requirements for new or expanded large industrial facilities in Oregon under the CPP's Best Available Emissions Reduction (BAER) program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they

benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,  
Joyce Coogan  
8780 W Fairview Ave  
Littleton, CO 80128

**From:** [Nancy J Wilihite \(nancy@terranovatour.com\) Sent You a Personal Message](mailto:nancy@terranovatour.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, October 5, 2023 7:38:23 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Nancy J Wilihite  
2154 NW Aspen Ave  
Portland, OR 97210  
[nancy@terranovatour.com](mailto:nancy@terranovatour.com)  
(503) 296-7913

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Anna Cowen \(annaysun@yahoo.com\) Sent You a Personal Message](mailto:annaysun@yahoo.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, October 5, 2023 8:03:17 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Anna Cowen  
19308 Leland Rd  
Oregon City, OR 97045  
annaysun@yahoo.com  
(503) 865-8406

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Bruce Raffety \(bbradf820@yahoo.com\) Sent You a Personal Message](mailto:bbradf820@yahoo.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, October 5, 2023 8:05:19 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

Leave fossil fuels in the ground

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Bruce Raffety  
1198 D St  
Baker City, OR 97814  
bbradf820@yahoo.com  
(541) 786-7017

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Cheryl Walsh \(wczwalsh@msn.com\) Sent You a Personal Message](mailto:wczwalsh@msn.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, October 5, 2023 8:28:28 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

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I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Cheryl Walsh  
1197 W. 5th. Ave.  
Eugene, OR 97402  
wczwalsh@msn.com  
(541) 484-9965

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Karen Froming \(kfroming@icloud.com\) Sent You a Personal Message](mailto:kfroming@icloud.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, October 5, 2023 8:30:29 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

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- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Karen Froming  
10 Othello St.  
Lake Oswego, OR 97035  
kfroming@icloud.com  
(415) 340-2850

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** Jim Lussier <campaigns@good.do>  
**Sent:** Thursday, October 5, 2023 9:15 AM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18-month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system; and
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Jim Lussier

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This email was sent by Jim Lussier via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic

no-reply address at campaigns@good.do, however Jim provided an email address (jlussier@bendcable.com) which we included in the REPLY-TO field.

Please reply to Jim Lussier at [jlussier@bendcable.com](mailto:jlussier@bendcable.com).

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**From:** [John Altshuler \(tomailakai@gmail.com\) Sent You a Personal Message](mailto:tomailakai@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, October 5, 2023 9:24:26 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

Please stand up to oil and gas. Finally the time has come that we acknowledge that self-regulation does not work and that the oil and gas industry need to be dealt with in terms of the lying and deception over many decades. Their focus on profit is hurt every country in the world and the planet itself. We need to have government control of oil and gas because they can't do an acceptable job themselves. Please do not let this status quo go on any longer.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

John Altshuler  
2910 Grand Cayman Dr,  
Eugene, OR 97408  
tomailakai@gmail.com  
(541) 683-9977

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If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** Joan Torok <campaigns@good.do>  
**Sent:** Thursday, October 5, 2023 10:04 AM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18-month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system; and
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Joan Torok

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no-reply address at campaigns@good.do, however Joan provided an email address (jm2torok@gmail.com) which we included in the REPLY-TO field.

Please reply to Joan Torok at jm2torok@gmail.com.

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<https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.dogooder.co%2F&data=05%7C01%7CClimate.2023%40stateoforegon.mail.onmicrosoft.com%7C04cd7197b0034e87d94308dbc5c512bb%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C638321222446379548%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Iik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=q6XNEL83EEqo6Hs2W6b2%2FWZkBr0ce1SxRuD5kcB316c%3D&reserved=0>

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**From:** Andrew Apter <campaigns@good.do>  
**Sent:** Thursday, October 5, 2023 10:06 AM  
**To:** 2023 Climate \* DEQ  
**Subject:** Please reconsider your proposed climate rules

Dear DEQ:

I appreciate your interest in public input on the proposed 2023 climate rules. Oregon's Climate Protection Program addresses the critical policies which set a minimum standard for meeting the state's climate goals.

Success in fulfilling the absolute need to confront the dire warming of the climate is complex. DEQ's role is especially important. The rules DEQ is proposing seriously undermine the state's ability to achieve its carefully crafted climate reduction goals. Most egregiously, DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

Given how clearly the proposed rules fail to address the state's climate goals, I am hoping you will make the following adjustments. :

- 1) Limit the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Disallow hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system; and
- 3) Strengthen emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Your role in ensuring a healthy future is vital. Please upgrade your rules in a manner that is consistent with the state's expressed goals.

Thank you for your time and attention,  
Andrew Apter

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Please reply to Andrew Apter at aw.apter@gmail.com.

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b4a0cea598cad161cf%7C0%7C0%7C638321223915793188%7CUnknown%7CTWFpbGZsb3d8eyJWljoiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Iik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=J3HlvSnbZuYQ5J0nvQwFj8DBMOuHkw%2BgontV2OxXBR0%3D&reserved=0

**From:** [Chris McClung](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Thursday, October 5, 2023 10:32:19 AM

---

You don't often get email from [chris@shadybrooklumber.com](mailto:chris@shadybrooklumber.com). [Learn why this is important](#)

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ **not** to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because new opportunities for development across will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will **not** include geographic limits for decarbonized fuels like renewable natural gas and **will** allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
**Christopher T McClung** MBA, CMA, EA  
Controller  
Shadybrook Lumber Products, Inc  
503-647-2234

**From:** [Andy Conklin](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Thursday, October 5, 2023 10:41:06 AM

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You don't often get email from [andy@shadybrooklumber.com](mailto:andy@shadybrooklumber.com). [Learn why this is important](#)

As an Oregonian and a manager of a small business in Oregon that provides jobs to 65+ Oregon families, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I'm also very concerned that we will lose our ability to stay competitive in locations that can be accessed by other states (about 60% of our business.) I urge DEQ **not** to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because new opportunities for development across will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will **not** include geographic limits for decarbonized fuels like renewable natural gas and **will** allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,

**Andy Conklin - MANAGER**  
Shadybrook Lumber Products  
Office – (503)389-3079  
Cell – (503)267-1926  
Email - [Andy@shadybrooklumber.com](mailto:Andy@shadybrooklumber.com)

**From:** [Shelby Bateson \(shelbyb28@gmail.com\) Sent You a Personal Message](mailto:shelbyb28@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, October 5, 2023 10:53:49 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

Natural gas is a fossil fuel. While the gas itself may or may not be seriously harming the environment, the method of getting natural gas from the ground (Fracking) seriously destroys areas surrounding fracking sites, while method of transporting it is equally dangerous. Further, removing natural gas from the ground is disruptive to the earth's crust and we've witnessed earthquakes in areas that are fracked where earthquakes were never occurring before.

We must continue to expand natural alternatives to energy procurement. There are now very small wind generators that can sit on rooftops, or along freeways to collect air movement and generate power. We should be looking into those alternative forms of energy and perhaps offering rebates on single family sized wind generators.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Shelby Bateson  
534 SE Inlet Ave  
Lincoln City, OR 97367  
[shelbyb28@gmail.com](mailto:shelbyb28@gmail.com)

(503) 819-6545

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**From:** [Art Lewellan](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** BEV vs PHEV vs HFCEV  
**Date:** Thursday, October 5, 2023 10:58:22 AM

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You don't often get email from lotilivo@gmail.com. [Learn why this is important](#)

The subject line is a trick question:

Which of the 3 basic EV drivetrains offers most potential to reduce fuel/energy consumption, emissions AND insane traffic?

Your answer here \_\_\_ \_\_\_ \_\_\_

**WRONG!!**

The correct answer is PHEV plug-in hybrid.

BEV best for lightweight and short-distance needs.

Combustible hydrogen PHEV+H stores at lower pressure in smaller, safer tanks and can deliver more than twice the equivalent MPG possible with fuel cell tech.

Why is this subject important you ask?

Use the word "equitable" to describe resource distribution.

ONE huge BEV freight truck battery packs (5 in 10 years).

Or as many as "500" household PHEVs (1 pack 10 years).

PHEV also better for big rigs. 1 BEV pack delivers 150k-200k miles.

The same pack divided into 5 PHEV packs also deliver 150k-200k miles to collectively deliver ONE MILLION miles vs 200k miles with BEV.

Divest Daimler ??

I'd like to get a response to my assertion that EV tech is wrongly misguided. My assertion is PHEV tech offers most potential for future EV fleets. PHEV is actually indispensable. The fossil fuel question {BEV vs PHEV} Which one reduces fuel consumption most? Correct answer: PHEV (even on fossil fuels).

Art Lewellan  
Pearl District Portland

**From:** [Sunny Tabino \(zcan0623@gmail.com\) Sent You a Personal Message](mailto:zcan0623@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, October 5, 2023 11:45:05 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

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- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Sunny Tabino  
70056 Sanderson Road  
Summerville, OR 97876  
zcan0623@gmail.com  
(541) 534-5815

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**From:** [David Drummond](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Thursday, October 5, 2023 11:55:04 AM

---

You don't often get email from david.drummond@interfor.com. [Learn why this is important](#)

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ **not** to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because new opportunities for development across will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will **not** include geographic limits for decarbonized fuels like renewable natural gas and **will** allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,

**David Drummond, CPA**  
**Director of Strategic Procurement**

**Interfor Corporation (Philomath & Molalla Sawmill Divisions)**

**From:** [bbauer1942@yahoo.com](mailto:bbauer1942@yahoo.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** effects of climate change  
**Date:** Thursday, October 5, 2023 12:40:48 PM

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You don't often get email from bbauer1942@yahoo.com. [Learn why this is important](#)

**The effects of climate change is happening every day. We must make major changes to our laws governing our environment. Please consider what is at state.  
Thank You  
BruceBauer**

**From:** [Bruce Stowell \(brstowell@gmail.com\) Sent You a Personal Message](mailto:brstowell@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, October 5, 2023 1:12:18 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

I believe that we are all responsible for the world we are passing on to those coming after us, our children and grandchildren. The heat of this past summer and the smoke of this summer's forest fires is looking like one of our main legacies; we must do more than we are to reduce the carbon we are putting into our atmosphere. Please stop the offsets allowed to the oil and gas industry.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

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Thank you for the opportunity to provide comments.

Sincerely,

Bruce Stowell  
3292 Rivercrest Drive  
Grants Pass, OR 97527  
brstowell@gmail.com  
(541) 660-2099

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If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [SINGH Nicole \\* DEQ](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** FW: Climate 2023 Proposed Rulemaking - LWVOR - Comments  
**Date:** Thursday, October 5, 2023 1:56:39 PM  
**Attachments:** [DEQ CPP Rules - LWVOR - Comments.pdf](#)

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Nicole Singh (*she/her*)  
Senior Climate Policy Advisor, Office of Greenhouse Gas Programs  
Oregon Department of Environmental Quality  
503-869-2119  
[nicole.singh@deq.oregon.gov](mailto:nicole.singh@deq.oregon.gov)

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**From:** TRAPP Lindsay \* DEQ <[lindsay.trapp@deq.oregon.gov](mailto:lindsay.trapp@deq.oregon.gov)>  
**Sent:** Thursday, October 5, 2023 1:01 PM  
**To:** SINGH Nicole \* DEQ <[Nicole.SINGH@deq.oregon.gov](mailto:Nicole.SINGH@deq.oregon.gov)>  
**Subject:** FW: Climate 2023 Proposed Rulemaking - LWVOR - Comments

Hey there!

Please see below and attached – it looks like they included old email addresses for Colin and Elizabeth, so I just wanted to make sure someone on your team received this one

Thanks!

**Lindsay Trapp** (*she/her*)  
Environmental Quality Commission Policy Analyst & Assistant  
Oregon Department of Environmental Quality  
[lindsay.trapp@deq.oregon.gov](mailto:lindsay.trapp@deq.oregon.gov)  
Cell: 971-357-4893

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**From:** League of Women Voters of Oregon <[lwvor@lwvor.org](mailto:lwvor@lwvor.org)>  
**Sent:** Thursday, October 5, 2023 12:30 PM  
**To:** [elizabeth.elbel@state.or.us](mailto:elizabeth.elbel@state.or.us); [colin.mcconnaha@state.or.us](mailto:colin.mcconnaha@state.or.us); 2023 Climate \* DEQ <[Climate.2023@deq.oregon.gov](mailto:Climate.2023@deq.oregon.gov)>  
**Cc:** TRAPP Lindsay \* DEQ <[lindsay.trapp@deq.oregon.gov](mailto:lindsay.trapp@deq.oregon.gov)>  
**Subject:** Climate 2023 Proposed Rulemaking - LWVOR - Comments

You don't often get email from [lwvor@lwvor.org](mailto:lwvor@lwvor.org). [Learn why this is important](#)

Hello,

Please see attached testimony sent from Claudia Keith, Climate Emergency Coordinator, and Arlene

Sherrett, Climate Emergency Portfolio, on behalf of the League of Women Voters of Oregon.

Best regards,

Staff

League of Women Voters of Oregon

*Phone:* [503-581-5722](tel:503-581-5722); *Email:* [lwvor@lwvor.org](mailto:lwvor@lwvor.org); *Web:* [www.lwvor.org](http://www.lwvor.org)



**From:** Tess Wobbe <campaigns@good.do>  
**Sent:** Thursday, October 5, 2023 2:05 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18-month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system; and
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Tess Wobbe

---

This email was sent by Tess Wobbe via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic

no-reply address at campaigns@good.do, however Tess provided an email address (numerousbooks@gmail.com) which we included in the REPLY-TO field.

Please reply to Tess Wobbe at numerousbooks@gmail.com.

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To learn more about web protocol RFC 3834 visit:

<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Ftools.ietf.org%2Fhtml%2Frfc3834&data=05%7C01%7CClimate.2023%40stateoforegon.mail.onmicrosoft.com%7C40aa1e75fad440d20d108dbc5e6ba49%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C638321367008771778%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6I1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=KDVPI0QfTE6fAGiK0vHSVGdLn2SL85uQEtYiBBS3TSQ%3D&reserved=0>

**From:** [Scott Penzarella \(spenzarella1@mac.com\)](mailto:spenzarella1@mac.com) Sent You a Personal Message  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, October 5, 2023 2:07:18 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

Stop oil and gas trickery

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Scott Penzarella  
3330 NW Luray Terrace  
Portland, OR 97210  
spenzarella1@mac.com  
(415) 407-0793

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**From:** [Jon Jensen](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Thursday, October 5, 2023 5:02:20 PM

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As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ **not** to further increase costs by imposing geographic limitations on renewable natural gas (RNG). Restricting opportunities for development will decrease supply and drive up costs.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will **not** include geographic limits for decarbonized fuels like renewable natural gas and **will** allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,

Jon Jensen  
Plant Manager  
Arauco Duraflake  
Albany, OR

	<p><b>Jon Jensen</b> <b>Duraflake Plant Manager</b> Phone: 541-917-6331 Cell: 541-974-6462 <a href="http://na.arauco.com">na.arauco.com</a></p>	
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**From:** Erica Maranowski <campaigns@good.do>  
**Sent:** Thursday, October 5, 2023 6:45 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

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By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

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- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system; and
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Erica Maranowski

---

This email was sent by Erica Maranowski via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our

generic no-reply address at campaigns@good.do, however Erica provided an email address (emaranowski@gmail.com) which we included in the REPLY-TO field.

Please reply to Erica Maranowski at emaranowski@gmail.com.

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**From:** [Gay Kramer-Dodd \(gaykramerdodd@yahoo.com\) Sent You a Personal Message](mailto:Gay Kramer-Dodd (gaykramerdodd@yahoo.com) Sent You a Personal Message)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, October 5, 2023 7:28:54 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

We absolutely must take seriously the fact that our planet and all life on it is in peril due to the climate crisis. My young grandchildren and all children deserve to have a livable planet!

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

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- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
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I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Gay Kramer-Dodd  
372 Lodenquai Ln.  
Eugene, OR 97404  
gaykramerdodd@yahoo.com  
(541) 461-1634

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**From:** [Steven Tichenor \(steven\\_tichenor@hotmail.com\) Sent You a Personal Message](mailto:steven_tichenor@hotmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, October 5, 2023 8:36:08 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Steven Tichenor  
636 Bolt Mountain Road  
Grants Pass, OR 97527  
steven\_tichenor@hotmail.com  
(541) 479-7516

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**From:** [Debra Higbee \(dwhigbes@gmail.com\) Sent You a Personal Message](mailto:dwhigbes@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, October 5, 2023 9:04:11 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Debra Higbee  
1281 Dalton Drive  
Eugene, OR 97404  
dwhigbes@gmail.com  
(541) 554-6979

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**From:** [David Collier](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Cc:** [David Collier](#); [Debra Higbee](#)  
**Subject:** Oregon Sierra Club Comments re proposed 2023 Climate Protection Program rule revisions  
**Date:** Thursday, October 5, 2023 9:47:42 PM  
**Attachments:** [Oregon Sierra Club Comments re 2023 CPP rule proposal.pdf](#)

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[You don't often get email from nellybel@comcast.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

The Oregon Sierra Club is submitting the attached comments regarding the proposed 2023 Climate Protection Program rule revisions.

Thank you

David Collier  
Oregon Sierra Club

**From:** [lee\\_schondorf \(adventure\\_kayak@yahoo.com\) Sent You a Personal Message](mailto:lee_schondorf@adventure_kayak@yahoo.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, October 6, 2023 7:19:14 AM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

Politician Corporate Shills must be imprisoned for life!

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

lee schondorf  
678 Charles St.  
Yoncalla, OR 97499  
adventure\_kayak@yahoo.com  
(541) 849-2181

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**From:** [Nadia Gardner](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Public Comment: Oregon's Climate Protection Program  
**Date:** Friday, October 6, 2023 8:39:06 AM

---

You don't often get email from [nadiaegardner@gmail.com](mailto:nadiaegardner@gmail.com). [Learn why this is important](#)

As a rural, north coast Oregon resident, I am very concerned about climate change's impacts on Oregonians, and I urge DEQ to make rules as rigorous as possible to assure much lower carbon emissions over time in alignment with best available science.

Please:

- Do not weaken the Best Available Emissions Reduction rules and instead adopt rules that put all polluting industries on a downward trajectory of emissions;
- Do not allow gas utilities to import unlimited Renewable Natural Gas from out of state to offset emissions;
- Do not allow gas utilities to use hydrogen unless the hydrogen is produced with electricity generated by renewable fuels; and
- Adopt rules consistent with the CPP as approved by the Environmental Quality Commission.

Thank you for helping to ensure that our children and grandchildren do not have a worse climate crisis situation. It is our fault that we are in the position we are today. We have a responsibility to do better.

Nadia Gardner  
80285 Woodland Hts Rd  
Arch Cape, OR 97102

**From:** [Barbara Lee](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Carbon emissions rules  
**Date:** Friday, October 6, 2023 9:19:01 AM

---

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I object to adoption of rules that are less rigorous than possible and that weaken Oregon's contribution to reversing the CLIMATE CRISIS.

Barbara Coombs Lee  
Sent from iPhone. Please excuse tiny keyboard goof ups.

**From:** [Elliot Riesterer](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Friday, October 6, 2023 9:51:12 AM

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As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ **not** to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because new opportunities for development across will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will **not** include geographic limits for decarbonized fuels like renewable natural gas and **will** allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,

**Elliot J. Riesterer, CPA**  
**Director of Finance**



P.O. Box 588  
380 S. Pacific Hwy  
Woodburn, OR 97071  
P: 503-874-3000 ext. 3070  
F: 503-902-0432

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**From:** [Judy Skopek \(judyskopek@yahoo.com\) Sent You a Personal Message](mailto:judyskopek@yahoo.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, October 6, 2023 10:22:15 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Judy Skopek  
3480 T Street  
Washougal, WA 98671  
[judyskopek@yahoo.com](mailto:judyskopek@yahoo.com)  
(760) 525-6225

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** Nancy Mauter <campaigns@good.do>  
**Sent:** Friday, October 6, 2023 10:32 AM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

The Climate Protection Program (CPP), rulemaking– if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

The public supports Oregon's climate pollution reduction goals and I am writing to request that:

- 1) Restricting biomethane used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system; and
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

It is essential that Oregon stays on track to achieve our climate goals. Otherwise, let's just throw in the towel and stay in denial till we have no choices to curb the climate crisis.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Nancy Mauter

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This email was sent by Nancy Mauter via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Nancy provided an email address (nanmauter@gmail.com) which we included in the REPLY-TO field.

Please reply to Nancy Mauter at nanmauter@gmail.com.

To learn more about Do Gooder visit

<https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.dogooder.co%2F&data=05%7C01%7CClimate.2023%40stateoforegon.mail.onmicrosoft.com%7C5840230e79a34c55547c08dbc6922cb3%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C638322103339671293%7CUnknown%7CTWFpbGZsb3d8eyJWljoimC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Iik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=b0UGbl3KuhJTPuK3%2FSzpSGZRQf0YjDJ9niPLDnwFjA%3D&reserved=0>

To learn more about web protocol RFC 3834 visit:

<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Ftools.ietf.org%2Fhtml%2Frfc3834&data=05%7C01%7CClimate.2023%40stateoforegon.mail.onmicrosoft.com%7C5840230e79a34c55547c08dbc6922cb3%7Caa3f6932fa7c4>

7b4a0cea598cad161cf%7C0%7C0%7C638322103339671293%7CUnknown%7CTWFpbGZsb3d8eyJWlloiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IjEkaWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=d%2BoPrW5iTziS%2BzRNYGmqin2qveyu5ZJfJE3r2wUsuqk%3D&reserved=0

**From:** [Tom Beatty \(muddlethruthis@gmail.com\) Sent You a Personal Message](mailto:muddlethruthis@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, October 6, 2023 11:12:37 AM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Tom Beatty  
P.O.Box 8555  
Coburg, OR 97408  
[muddlethruthis@gmail.com](mailto:muddlethruthis@gmail.com)  
(541) 345-0410

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Tami Howard \(whistlewart@yahoo.com\)](mailto:whistlewart@yahoo.com) Sent You a Personal Message  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, October 6, 2023 11:51:28 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Tami Howard  
29755 Southwest Rose Lane, 184  
Wilsonville, OR 97070  
whistlewart@yahoo.com  
(541) 270-7718

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Claudia Judson \(missycj8301@gmail.com\) Sent You a Personal Message](mailto:missycj8301@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, October 6, 2023 11:51:59 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

I want to have a future.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Claudia Judson  
155 NW Kings Blvd  
Corvallis, OR 97330  
missycj8301@gmail.com  
(503) 689-5841

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Jennifer LAJEUNESSE \(jenlajski@gmail.com\) Sent You a Personal Message](mailto:jenlajski@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, October 6, 2023 11:54:42 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Jennifer LAJEUNESSE  
1065 kohl  
Broomfield, CO 80020  
jenlajski@gmail.com  
(440) 533-5377

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Linea Fuller \(lineafuller2@gmail.com\) Sent You a Personal Message](mailto:lineafuller2@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, October 6, 2023 11:54:47 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

Please restore my faith in humanity. Nature is a necessity and finite.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Linea Fuller  
18137 Fadjur lane  
Sisters, OR 97759  
[lineafuller2@gmail.com](mailto:lineafuller2@gmail.com)  
(310) 945-8859

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**From:** [Lisa Read \(lisaread9@gmail.com\) Sent You a Personal Message](mailto:lisaread9@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, October 6, 2023 11:55:22 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

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Thank you for the opportunity to provide comments.

Sincerely,

Lisa Read  
8717 SE Monterey Ave  
Happy Valley, OR 97086  
lisaread9@gmail.com  
(503) 890-4510

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Kristine Riccardi \(gizmotoall@aol.com\) Sent You a Personal Message](mailto:gizmotoall@aol.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, October 6, 2023 11:56:31 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Kristine Riccardi  
15245 SW Jasper Ln  
Beaverton, OR 97007  
gizmotoall@aol.com  
(503) 590-4541

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Priscilla Connolly \(dpgreatlife@yahoo.com\) Sent You a Personal Message](mailto:dpgreatlife@yahoo.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, October 6, 2023 11:56:43 AM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

Please do the right thing for our planet.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Priscilla Connolly  
11690 NW Damascus St  
Portland, OR 97229  
dpgreatlife@yahoo.com  
(503) 310-0594

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Andrew Simrin \(marioman3@gmail.com\) Sent You a Personal Message](mailto:marioman3@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, October 6, 2023 11:58:17 AM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

Way to be doing all we can to stop subsidizing pollution and carbon and other greenhouse gas emissions during this climate crisis.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

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Thank you for the opportunity to provide comments.

Sincerely,

Andrew Simrin  
104 Maynard Avenue  
Eugene, OR 97404  
marioman3@gmail.com  
(541) 791-6630

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Allison Edmiston \(allicat2710@gmail.com\)](mailto:allicat2710@gmail.com) Sent You a Personal Message  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, October 6, 2023 12:00:25 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

Duty now for the future!!!

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Allison Edmiston  
7135 SW Onyx Road  
Terrebonne, OR 97760  
[allicat2710@gmail.com](mailto:allicat2710@gmail.com)  
(808) 281-6220

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Karen McEntire \(klmcentire@yahoo.com\) Sent You a Personal Message](mailto:klmcentire@yahoo.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, October 6, 2023 12:02:04 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

I have a small grandson I want to grow up in a safe environment. That means we must transition and polluters must be held accountable to stop and restore the damage they have caused. Oil and gas companies have known for generations that they are contributing to climate change and pollution and have done nothing to change and a lot to increase the problem. "Drill baby drill" cannot stand!

Thank you

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Karen McEntire  
4532 SW 11th St  
Gresham, OR 97080  
klmcentire@yahoo.com  
(775) 450-8237

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [maggie Rivera \(maggiemrivera@yahoo.com\) Sent You a Personal Message](mailto:maggiemrivera@yahoo.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, October 6, 2023 12:02:42 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

maggie Rivera  
3714 SE Ogden St  
Portland, OR 97202  
[maggiemrivera@yahoo.com](mailto:maggiemrivera@yahoo.com)  
(503) 288-8601

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Stephen Fuller-Rowell \(sjfr2@aol.com\) Sent You a Personal Message](mailto:sjfr2@aol.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, October 6, 2023 12:09:46 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Stephen Fuller-Rowell  
91 N Polk St  
Eugene, OR 97402  
sjfr2@aol.com  
(707) 494-5769

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Shelly Cash Wood \(sjccash@icloud.com\) Sent You a Personal Message](mailto:sjccash@icloud.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, October 6, 2023 12:10:05 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

Being a downwinder from exposure in Oregon I know that toxic actions are happening hidden but not forgotten

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Shelly Cash Wood  
52863 Wayside Loop  
LaPine, OR 97739  
sjccash@icloud.com  
(541) 306-7417

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Chantal Klee \(chantalsnedden@gmail.com\) Sent You a Personal Message](mailto:chantalsnedden@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, October 6, 2023 12:16:40 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

Our community and its constituents in Oregon deserve better. Please consider amending the DEQ ruling as outlined below. Our children's future is at stake.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Chantal Klee  
255 NE 194th Ave  
Portland, OR 97230  
[chantalsnedden@gmail.com](mailto:chantalsnedden@gmail.com)  
(503) 490-2092

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Jeff Jones \(atlantajjones@yahoo.com\) Sent You a Personal Message](mailto:atlantajjones@yahoo.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, October 6, 2023 12:22:21 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

Jeff Jones  
19580 SW 48th Ave  
Tualatin, OR 97062  
atlantajjones@yahoo.com  
(770) 778-1442

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Laura Waite \(fozzynutmeg@hotmail.com\) Sent You a Personal Message](mailto:fozzynutmeg@hotmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, October 6, 2023 12:34:14 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

Every climate action is a good one !

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Laura Waite  
1711 NE Liberty St  
Portland, OR 97211  
fozzynutmeg@hotmail.com  
(503) 724-4978

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Dylan Plummer \(dylanplummer310@gmail.com\) Sent You a Personal Message](mailto:dylanplummer310@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, October 6, 2023 12:35:04 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

Dylan Plummer  
2633 Harris st  
Eugene, OR 97405  
dylanplummer310@gmail.com  
(541) 531-1858

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [craig rhine \(cgrhine@comcast.net\)](mailto:cgrhine@comcast.net) Sent You a Personal Message  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, October 6, 2023 12:36:20 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

craig rhine  
14290 , SW Barlow Court  
Beaverton, OR 97008  
cgrhine@comcast.net  
(503) 312-3697

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [sarah caldwell \(sarah.caldwell@comcast.net\) Sent You a Personal Message](mailto:sarah.caldwell@comcast.net)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, October 6, 2023 12:37:16 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

sarah caldwell  
3077 ne weddell st  
Bend, CA 97701  
sarah.caldwell@comcast.net  
(707) 590-8065

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Laurel Ramsey \(laurelramsey130@gmail.com\) Sent You a Personal Message](mailto:laurelramsey130@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, October 6, 2023 12:41:01 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

Laurel Ramsey  
946 Oak St  
Silverton, OR 97381  
laurelramsey130@gmail.com  
(503) 547-4676

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Elizabeth Hall \(deehallvida@gmail.com\) Sent You a Personal Message](mailto:deehallvida@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, October 6, 2023 12:41:32 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

Let's actually encourage clean industries in Oregon

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Elizabeth Hall  
PO BOX 306, 46451 Gate Creek Rd  
Vida, OR 97488  
[deehallvida@gmail.com](mailto:deehallvida@gmail.com)  
(541) 556-6888

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Becky Weinstein \(becky.weinstein@yahoo.com\) Sent You a Personal Message](mailto:becky.weinstein@yahoo.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, October 6, 2023 12:45:56 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

Climate change has had a profound impact on our forests and quality of life. Please do not diminish requirements on corporations and business interests.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Becky Weinstein  
455 23rd. Ct. NW  
Salem, OR 97304  
[becky.weinstein@yahoo.com](mailto:becky.weinstein@yahoo.com)  
(503) 931-4862

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Sally Clippell](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Friday, October 6, 2023 1:04:58 PM

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You don't often get email from [sclippell@cascademeatsinc.com](mailto:sclippell@cascademeatsinc.com). [Learn why this is important](#)

To whom it may concern;

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ **not** to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because new opportunities for development across will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will **not** include geographic limits for decarbonized fuels like renewable natural gas and **will** allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,

*Sally Clippell*

Cascade Meats, Inc.

P.O. Box 939 \* Woodburn, Oregon

Office: 503-874-3036 \* Cell: 503-508-2017

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This communication is the property of BrucePac and may contain confidential or privileged information. Unauthorized use of this communication is strictly prohibited and may be unlawful. Whilst reasonable efforts are made to ensure this e-mail and attachments are free from computer viruses, BrucePac accepts no liability for the consequences of computer infection on the receivers IT Systems. If you have received this communication in error, please immediately notify the sender by reply e-mail and destroy all copies of the communication and its attachments. BPMSGID65 Thank you. ßþ\$

**From:** [Michael Golden \(glowball222@outlook.com\) Sent You a Personal Message](mailto:glowball222@outlook.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, October 6, 2023 1:10:54 PM

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Thank you for the opportunity to provide comments.

Sincerely,

Michael Golden  
777 Missouri Flat Rd  
Grants Pass, OR 97527  
[glowball222@outlook.com](mailto:glowball222@outlook.com)  
(541) 441-1118

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Ali Gray \(ali@peak.org\) Sent You a Personal Message](mailto:ali@peak.org)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, October 6, 2023 1:15:48 PM

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Thank you for the opportunity to provide comments.

Sincerely,

Ali Gray  
556 22nd Ave SW  
Albany, OR 97322  
ali@peak.org  
(541) 619-9594

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Marcus Lanskey \(mlanskey@gmail.com\) Sent You a Personal Message](mailto:mlanskey@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, October 6, 2023 1:22:56 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

We don't want OR to be a polluter dumping ground

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Marcus Lanskey  
3867 Potter St  
Eugene, OR 97405  
mlanskey@gmail.com  
(541) 501-2760

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Lin Reedijk \(greengirlpdx@yahoo.com\) Sent You a Personal Message](mailto:greengirlpdx@yahoo.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, October 6, 2023 1:24:38 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

Paying to pollute must come to an immediate end. Our recent weather conditions have shown the impact that fossil fuels are having on our environment and weather. We must take immediate steps to protect ourselves from the impact of the fossil fuel industry.

To whom it may concern,

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Thank you for the opportunity to provide comments.

Sincerely,

Lin Reedijk  
19561 River Rd #34  
Gladstone, OR 97027  
greengirlpdx@yahoo.com  
(503) 227-4698

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415)

977-5673.

**From:** [Amber Elmwood \(palabokfiesta@gmail.com\) Sent You a Personal Message](mailto:palabokfiesta@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, October 6, 2023 1:40:42 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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Sincerely,

Amber Elmwood  
4110 SE Hawthorne Blvd #447  
Portland, OR 97214  
palabokfiesta@gmail.com  
(971) 533-9132

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [William Obrien \(wobobr123@yahoo.com\) Sent You a Personal Message](mailto:wobobr123@yahoo.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, October 6, 2023 1:49:24 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

William Obrien  
12520 SW Gem Ln Apt 202  
Beaverton, OR 97005  
wobobr123@yahoo.com  
(503) 679-5194

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Tascha Babitch \(amiwoman@gmail.com\) Sent You a Personal Message](mailto:amiwoman@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, October 6, 2023 2:01:18 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

Tascha Babitch  
2011 SE 12th Ave  
Portland, OR 97214  
[amiwoman@gmail.com](mailto:amiwoman@gmail.com)  
(408) 348-0579

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Peter Wood \(pwood@lmi.net\) Sent You a Personal Message](mailto:pwood@lmi.net)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, October 6, 2023 2:03:42 PM

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Thank you for the opportunity to provide comments.

Sincerely,

Peter Wood  
8316 N. Lombard St. PMB 368  
Portland, OR 97203  
pwood@lmi.net  
(503) 830-7375

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Florence Harrod \(f.harrod@spectrum.net\)](mailto:f.harrod@spectrum.net) Sent You a Personal Message  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, October 6, 2023 2:06:15 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

Florence Harrod  
6080 Mercer Lake Rd  
Florence, OR 97439  
f.harrod@spectrum.net  
(760) 212-0335

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Janice Palmrose \(jepalmrose8@gmail.com\) Sent You a Personal Message](mailto:jepalmrose8@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, October 6, 2023 2:44:16 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

It's insane corporations pay to play. This so wrong on too many levels!

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Janice Palmrose  
18565 W Baseline Rd, Apt#414  
Beaverton, OR 97006  
jepalmrose8@gmail.com  
(503) 764-8582

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Steve Poizat-Newcomb \(snewcomb@gmail.com\) Sent You a Personal Message](mailto:snewcomb@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, October 6, 2023 2:48:13 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

No amount of money can compensate for the destruction of our environment.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Steve Poizat-Newcomb  
1105 W. 27th Ave.  
Eugene, OR 97405  
snewcomb@gmail.com  
(541) 221-8666

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Michael Halloran \(mshalloran2605@gmail.com\) Sent You a Personal Message](mailto:mshalloran2605@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, October 6, 2023 2:48:31 PM

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Thank you for the opportunity to provide comments.

Sincerely,

Michael Halloran  
2062 Scotsman Ln NE  
Salem, OR 97305  
mshalloran2605@gmail.com  
(503) 887-6873

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Savas Kansier \(sk1842@gmail.com\) Sent You a Personal Message](mailto:sk1842@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, October 6, 2023 2:50:07 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

Savas Kansier  
327 Taybin Rd NW  
Salem, OR 97304  
sk1842@gmail.com  
(406) 360-6554

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Chris Coughlin](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Comments on Proposed Rule  
**Date:** Friday, October 6, 2023 2:52:03 PM  
**Attachments:** [OCJ comments DEQ climate rules .pdf](#)

---

You don't often get email from [ccoughlin@ocj.org](mailto:ccoughlin@ocj.org). [Learn why this is important](#)

Attached are Oregon Consumer Justice's comments on the proposed rule on the Climate Protection Program. Thank you for this opportunity.

Chris

**Chris Coughlin** | she/her/hers ([hear my name](#))  
Policy Director  
[ccoughlin@ocj.org](mailto:ccoughlin@ocj.org)  
[ocj.org](http://ocj.org)  
503.312.8178

**Sign up for [email updates](#)** and follow us on [Facebook](#), [Twitter](#), [Instagram](#), and [LinkedIn](#).



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**From:** [Marina Richie \(marinarichie1@gmail.com\) Sent You a Personal Message](mailto:marinarichie1@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, October 6, 2023 2:53:53 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

No loopholes for polluters !

To whom it may concern,

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Thank you for the opportunity to provide comments.

Sincerely,

Marina Richie  
60081 Turquoise Road  
Marina, OR 97702  
marinarichie1@gmail.com  
(406) 370-7556

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Marcel Liberge \(dustypuns@gmail.com\) Sent You a Personal Message](mailto:dustypuns@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, October 6, 2023 3:28:45 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

DUH!!!

To whom it may concern,

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Sincerely,

Marcel Liberge  
11020 N. Applegate Rd MO  
Grants Pass, OR 97527  
dustypuns@gmail.com  
(541) 916-2554

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Robert Burns \(elvish.realest.Ou@icloud.com\) Sent You a Personal Message](mailto:Robert.Burns@sierraclub.org)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, October 6, 2023 3:36:12 PM

---

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To whom it may concern,

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However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

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- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Robert Burns  
PO Box 486  
Manzanita, OR 97130  
elvish.realest.Ou@icloud.com  
(503) 812-5612

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Bill Denham \(bill1028@pacbell.net\) Sent You a Personal Message](mailto:bill1028@pacbell.net)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, October 6, 2023 3:39:29 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

I realize change does not happen instantly but some times the consequences require taking action. I believe now is the time to act! I am 81 years old. So I am lobbying for my grand children and children!

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Bill Denham  
4908 SE 38th Avenue  
Portland, OR 97202  
[bill1028@pacbell.net](mailto:bill1028@pacbell.net)  
(510) 682-5452

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Robin Foster \(rllcfoster39@gmail.com\) Sent You a Personal Message](mailto:rllcfoster39@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, October 6, 2023 3:41:56 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

Let's STOP allowing pollution for a healthier state to live and breathe in!

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Robin Foster  
70 Spyglass Lane  
Florence, OR 97439  
rllcfoster39@gmail.com  
(406) 241-8291

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Jacqueline Jenkins \(jjenkins@volcano.net\)](mailto:jjenkins@volcano.net) Sent You a Personal Message  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, October 6, 2023 4:42:04 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Jacqueline Jenkins  
3789 5th Ave N  
Keizer, OR 97303  
jjenkins@volcano.net  
(830) 581-9694

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Kimberly Stein](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Please strengthen climate protection  
**Date:** Friday, October 6, 2023 4:58:30 PM

---

You don't often get email from iowatwister@yahoo.com. [Learn why this is important](#)

Dear Department of Environmental Quality,

Sent from my iPhone

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

1) Restricting biomethane or hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of “book and claim” accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and

2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP’s Best Available Emissions Reduction program.

Sincerely,

Kim Stein

**From:** [trolewis](mailto:trolewis@gmail.com)  
**To:** [2023 Climate - DEQ](#)  
**Subject:** Please strengthen proposed 2023 climate rules  
**Date:** Friday, October 6, 2023 5:17:37 PM

You don't often get email from [trolewis@gmail.com](mailto:trolewis@gmail.com). [Learn why this is important](#)

Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered.

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**From:** [darcy miller](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Friday, October 6, 2023 5:34:23 PM

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You don't often get email from darcybmiller@gmail.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

However, I was disappointed to hear that the recent rule-making table did not include community input, and also that the results lacked in meeting the plan's original goals of reducing greenhouse gas emissions by 50%, providing meaningful investments to benefit Oregonians, and holding big polluters accountable.

Therefore, I am calling on the DEQ to adapt the rules for CPP implementation to focus on the original goals of:

- 1) Reducing greenhouse gas emissions and other air pollutants, maximizing public health benefits, and minimizing costs for consumers in environmental justice and other communities in Oregon.
- 2) Keeping economic and health benefits of the Community Climate Investment program in Oregon: investments should materially benefit Oregonians at the frontlines of pollution and the climate crisis, rather than paying for cheap offsets in other places.
- 3) Achieving real reduction of emissions by 50%, rather than allowing companies to invest in biomass-derived fuels such as "renewable natural gas" (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
- 4) Holding big polluters accountable to engage in science-based "best available emissions reductions" (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.
- 5) Returning the date for a "new source" of stationary pollution to December 31, 2021.

The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
darcy miller  
10120 SE Cambridge Ln  
Portland, OR 97222

**From:** [Alisha Stireman-Beyer \(alishastiremanbeyer@gmail.com\) Sent You a Personal Message](mailto:alishastiremanbeyer@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, October 6, 2023 5:34:45 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

Alisha Stireman-Beyer  
13436 Southeast Bush Street, Apt D11  
PORTLAND, OR 97236  
[alishastiremanbeyer@gmail.com](mailto:alishastiremanbeyer@gmail.com)  
(801) 759-1159

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**From:** [Kate Mullican](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Friday, October 6, 2023 5:35:31 PM

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You don't often get email from kate.mullican@gmail.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

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The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
Kate Mullican  
9328 N Chicago Ave  
Portland, OR 97203

**From:** [Val Basom \(valvariousmedia@yahoo.com\) Sent You a Personal Message](mailto:valvariousmedia@yahoo.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, October 6, 2023 5:36:06 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

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Thank you for the opportunity to provide comments.

Sincerely,

Val Basom  
16704 SE Oatfield Rd  
Millwaukie, OR 97267  
valvariousmedia@yahoo.com  
(503) 659-4032

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Allyson Smith \(allysonsmith29@yahoo.com\)](mailto:allysonsmith29@yahoo.com) Sent You a Personal Message  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, October 6, 2023 5:58:15 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

It is time to get real about protecting our environment. There are so many excuses to delay taking firm action, but there always will be. Our planet is on the brink of collapse if we don't take action now to protect it. Nature and the people who live here deserve clean air, pure water, and uncontaminated food. Let's make this happen now!

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Allyson Smith  
88005 , Windjammer S.  
Florence, OR 97439  
[allysonsmith29@yahoo.com](mailto:allysonsmith29@yahoo.com)  
(541) 806-4088

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977-5673.

**From:** [Derek Benedict](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Friday, October 6, 2023 6:15:24 PM

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Dear 2023 DEQ Climate Rulemaking,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane (aka renewable natural gas (RNG)) used for CPP compliance to that which produces direct benefits for Oregonians – projects that reduce pollution in Oregon.
- 2) Disallowing hydrogen to be used for CPP compliance unless it is green electrolytic hydrogen (made from renewable energy sources like solar and wind). Why? Not all hydrogen is created equally. Where and how it is produced and used matters significantly when it comes to emissions reduction – if it's produced from fossil fuels out-of-state, it could be more polluting than even natural gas.
- 3) Strengthening emissions reduction requirements for new or expanded large industrial facilities in Oregon under the CPP's Best Available Emissions Reduction (BAER) program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they

benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,  
Derek Benedict  
709 212th Pl SW  
Lynnwood, WA 98036

**From:** [bbenbaruch@ashlandhome.net](mailto:bbenbaruch@ashlandhome.net)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Friday, October 6, 2023 6:34:02 PM

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You don't often get email from [bbenbaruch@ashlandhome.net](mailto:bbenbaruch@ashlandhome.net). [Learn why this is important](#)

Dear Chair George, Vice Chair Baraso, members of the Commission,

We are facing an existential crisis because of climate change. The rules you make will have consequences for the climate and and consequently for the well-being of everyone in Oregon. Minimally, the DEQ must ensure the Climate Protection Program stays on track to achieve its climate goals and deliver public health, economic, and job benefits for Oregon communities.

If done well, your rules will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. If done poorly, your decisions will negatively impact our lives and well-being.

Given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered.

- I am concerned that DEQ's current proposed rules would effectively undermine the CPP— a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.
- Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon.
- By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.
- I therefore strongly urge DEQ to amend the proposed rules by:
  - Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
  - Strengthening emissions reduction requirements for new or expanded large

stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

- I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from anthropogenic carbon sources does not comply with the CPP.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits—ensuring that they benefit Oregon communities, and are not exported out of state.

Sincerely,

**Benjamin Ben-Baruch**  
**461 N Mountain Ave**  
**Ashland OR 97520**  
**734-507-0862**

**From:** [Mark Forrette \(markforrette@yahoo.com\) Sent You a Personal Message](mailto:markforrette@yahoo.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, October 6, 2023 6:55:23 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

We need clean air and water! Quit stalling!

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Mark Forrette  
1217 Loal Street  
Medford, OR 97501  
markforrette@yahoo.com  
(775) 842-4188

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Imogen Taylor](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Friday, October 6, 2023 7:20:37 PM

---

You don't often get email from imogen.taylor@gmail.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

However, I was disappointed to hear that the recent rule-making table did not include community input, and also that the results lacked in meeting the plan's original goals of reducing greenhouse gas emissions by 50%, providing meaningful investments to benefit Oregonians, and holding big polluters accountable.

Therefore, I am calling on the DEQ to adapt the rules for CPP implementation to focus on the original goals of:

- 1) Reducing greenhouse gas emissions and other air pollutants, maximizing public health benefits, and minimizing costs for consumers in environmental justice and other communities in Oregon.
- 2) Keeping economic and health benefits of the Community Climate Investment program in Oregon: investments should materially benefit Oregonians at the frontlines of pollution and the climate crisis, rather than paying for cheap offsets in other places.
- 3) Achieving real reduction of emissions by 50%, rather than allowing companies to invest in biomass-derived fuels such as "renewable natural gas" (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
- 4) Holding big polluters accountable to engage in science-based "best available emissions reductions" (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.
- 5) Returning the date for a "new source" of stationary pollution to December 31, 2021.

The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
Imogen Taylor  
515 N Holland St  
Portland, OR 97217

**From:** [Imogen Taylor](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Friday, October 6, 2023 7:22:33 PM

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You don't often get email from imogen.taylor@gmail.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

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- 4) Holding big polluters accountable to engage in science-based "best available emissions reductions" (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.
- 5) Returning the date for a "new source" of stationary pollution to December 31, 2021.

The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
Imogen Taylor  
515 N Holland St  
Portland, OR 97217

**From:** [Dorinne Tye \(dorinne.tye@gmail.com\)](mailto:dorinne.tye@gmail.com) Sent You a Personal Message  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, October 6, 2023 7:47:43 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

Please amend, no loopholes, no subsidies, no harm

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Dorinne Tye  
62465 Powell Butte Hwy  
Bend, OR 97701  
dorinne.tye@gmail.com  
(541) 851-6201

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Sidney Wood \(sidney.wood1958@gmail.com\) Sent You a Personal Message](mailto:sidney.wood1958@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, October 6, 2023 8:38:59 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

Please protect Oregonians from illegal pollution by oil and gas companies. Reject industries efforts to avoid regulations and pay to pollute.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Sidney Wood  
245 12th Ave  
Seaside, OR 97138  
sidney.wood1958@gmail.com  
(971) 326-0008

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Mike Flaningam \(mikeflanny@hotmail.com\) Sent You a Personal Message](mailto:mikeflanny@hotmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, October 6, 2023 8:53:05 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

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Thank you for the opportunity to provide comments.

Sincerely,

Mike Flaningam  
115 SW Gull Station  
Depoe Bay, OR 97341  
mikeflanny@hotmail.com  
(916) 712-3603

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Michaela Willi Hooper](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Friday, October 6, 2023 9:09:08 PM

---

You don't often get email from michaela.willi@gmail.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I live in west Eugene, an area heavily impacted by industrial pollution. Between emissions and wildfires, the air quality is often so poor we wear masks and run air purifiers.

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. However, I was disappointed to hear that the recent rule-making table did not include community input, and also that the results lacked in meeting the plan's original goals of reducing greenhouse gas emissions by 50%, providing meaningful investments to benefit Oregonians, and holding big polluters accountable.

Therefore, I am calling on the DEQ to adapt the rules for CPP implementation to focus on the original goals of:

- 1) Reducing greenhouse gas emissions and other air pollutants, maximizing public health benefits, and minimizing costs for consumers in environmental justice and other communities in Oregon.
- 2) Keeping economic and health benefits of the Community Climate Investment program in Oregon: investments should materially benefit Oregonians at the frontlines of pollution and the climate crisis, rather than paying for cheap offsets in other places.
- 3) Achieving real reduction of emissions by 50%, rather than allowing companies to invest in biomass-derived fuels such as "renewable natural gas" (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
- 4) Holding big polluters accountable to engage in science-based "best available emissions reductions" (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.
- 5) Returning the date for a "new source" of stationary pollution to December 31, 2021.

The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
Michaela Willi Hooper  
2149 Dakota St.  
Eugene, OR 97402

**From:** [John Bruce \(jwbruce39@gmail.com\) Sent You a Personal Message](mailto:jwbruce39@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, October 6, 2023 9:47:37 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

John Bruce  
938 SW26 Lane  
Redy, OR 97756  
jwbruce39@gmail.com  
(970) 769-1289

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Joe Rawlings \(plunderedplato@hotmail.com\) Sent You a Personal Message](mailto:Joe.Rawlings@plunderedplato@hotmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, October 6, 2023 10:12:30 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

Our grandchildren need to be able to live on an earth free of the pollution we live with.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Joe Rawlings  
1366 Astor Ct.  
Woodburn, OR 97071  
[plunderedplato@hotmail.com](mailto:plunderedplato@hotmail.com)  
(503) 830-2452

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Joe Rawlings \(plunderedplato@hotmail.com\) Sent You a Personal Message](mailto:Joe.Rawlings@plunderedplato@hotmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, October 6, 2023 10:17:11 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

Our grandchildren and all the species that live together today need to live together in the future. We must pay attention!

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Joe Rawlings  
1366 Astor Ct.  
Woodburn, OR 97071  
[plunderedplato@hotmail.com](mailto:plunderedplato@hotmail.com)  
(503) 830-2452

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Jane bartosz \(janemir@msn.com\) Sent You a Personal Message](mailto:janemir@msn.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, October 6, 2023 11:02:48 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

It's important that all communities have healthy environments.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Jane bartosz  
1125 Genie Ct SE  
Salem, OR 97306  
janemir@msn.com  
(503) 391-8848

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Chris Chaplin \(chris.chaplin@protonmail.com\)](mailto:chris.chaplin@protonmail.com) Sent You a Personal Message  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Friday, October 6, 2023 11:44:12 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

Please put some teeth in the DEQ

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Chris Chaplin  
4016 SE 72nd Ave  
Portland, OR 97206  
[chris.chaplin@protonmail.com](mailto:chris.chaplin@protonmail.com)  
(804) 971-2509

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Derek Gendvil](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Saturday, October 7, 2023 3:37:48 AM

---

You don't often get email from [dgendvil@gmail.com](mailto:dgendvil@gmail.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

However, I was disappointed to hear that the recent rule-making table did not include community input, and also that the results lacked in meeting the plan's original goals of reducing greenhouse gas emissions by 50%, providing meaningful investments to benefit Oregonians, and holding big polluters accountable.

Therefore, I am calling on the DEQ to adapt the rules for CPP implementation to focus on the original goals of:

- 1) Reducing greenhouse gas emissions and other air pollutants, maximizing public health benefits, and minimizing costs for consumers in environmental justice and other communities in Oregon.
- 2) Keeping economic and health benefits of the Community Climate Investment program in Oregon: investments should materially benefit Oregonians at the frontlines of pollution and the climate crisis, rather than paying for cheap offsets in other places.
- 3) Achieving real reduction of emissions by 50%, rather than allowing companies to invest in biomass-derived fuels such as "renewable natural gas" (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
- 4) Holding big polluters accountable to engage in science-based "best available emissions reductions" (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.
- 5) Returning the date for a "new source" of stationary pollution to December 31, 2021.

The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
Derek Gendvil  
9030 W Sahara Ave PMB 360  
Las Vegas, NV 89117

**From:** [Susan Smith](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Saturday, October 7, 2023 6:14:29 AM

---

You don't often get email from clod456@gmail.com. [Learn why this is important](#)

Dear 2023 DEQ Climate Rulemaking,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane (aka renewable natural gas (RNG)) used for CPP compliance to that which produces direct benefits for Oregonians – projects that reduce pollution in Oregon.
- 2) Disallowing hydrogen to be used for CPP compliance unless it is green electrolytic hydrogen (made from renewable energy sources like solar and wind). Why? Not all hydrogen is created equally. Where and how it is produced and used matters significantly when it comes to emissions reduction – if it's produced from fossil fuels out-of-state, it could be more polluting than even natural gas.
- 3) Strengthening emissions reduction requirements for new or expanded large industrial facilities in Oregon under the CPP's Best Available Emissions Reduction (BAER) program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they

benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

**I SUPPORT THE CPP!!! THE DEQ NEEDS TO DO EXACTLY WHAT THEIR NAME SAYS - ENVIRONMENTAL QUALITY!! KEEP OUR ENVIRONMENT FROM BECOMING MORE POLLUTED; REDUCE EMISSIONS, MINIMIZE COSTS TO THE PUBLIC AND DON'T DIVERT MONEY FROM THE CCI PROGRAM!!!!!!**

Sincerely,  
Susan Smith  
123 N O St  
Sacramento, CA 95678

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 6:35:02 AM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Ann Reece  
480 Salem Heights Avenue South  
Salem, OR 97302  
dashnt@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 6:37:57 AM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
John Lukes  
404 S COLUMBIA DR  
WOODBURN, OR 97071  
johnlukes369@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 6:38:22 AM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Marilyn Gunther  
7715 SW 189th Ave  
Aloha, OR 97007  
marilyngunther@comcast.net

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 6:38:44 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Suzy Brander  
8437 SW 4th Avenue  
Portland, OR 97219  
suzysmail@comcast.net

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 6:42:45 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Stephen Ottmer  
154 Cambridge Ave  
Silverton , OR 97381  
crossgrain@comcast.net

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 6:43:06 AM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Kevin Domina  
13415 SE Brant Ct  
Damascus, OR 97089  
ktdomina@frontier.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 6:44:41 AM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Penny Ottmer  
154 Cambridge Ave  
Silverton , OR 97381  
cgcobuild@yahoo.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 6:44:47 AM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Noelle Marier  
565 Evans Avenue N  
Keizer, OR 97303  
likemagic@comcast.net

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 6:47:57 AM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I am extremely concerned that we are putting all of our future energy needs into one basket. We cannot drive natural gas out of the picture I making it more and more expensive to use. Just as we cannot rely on electric cars for a future transportation needs, we must have the resources available and affordable for the continued growth and prospering of our state and country. Please don't drive out natural gas from the energy/heating tools that we have available.

I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Tim Stevenson  
15641 NE Stanton St.  
Portland , OR 97230  
Orstevenson@netscape.net

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 6:49:23 AM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Kristen Schnackenberg  
2885 SE 22nd Ter  
Gresham, OR 97080  
kschnack44@yahoo.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 6:49:55 AM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Michael Wall  
1624 Jefferson St SE  
Albany, OR 97322  
mkdbwall@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 6:50:24 AM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Chris Farrington  
3744 SW 52nd Place  
Portland, OR 97221  
taggart77@hotmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 6:50:24 AM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

I also do not believe fossil fuel usage should be eliminated. There is a balance that should be achieved with a mixture of all the different types of energy.

Sincerely,  
Cynthia Kingen  
9850 SE PARKWOOD WAY  
HAPPY VALLEY, OR 97086  
cindymm1954@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 6:50:33 AM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Thomas Drew  
320 Walnut Lane  
Eugene, OR 97401  
tomd@atwmfg.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 6:50:45 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Charles Carlson  
1818 Armadale Avenue  
Hood River, OR 97031  
charles.carlson@hotmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 6:51:16 AM

---

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
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Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Marcus Ray  
335 NW Miller Rd  
Portland, OR 97229  
therays@therayfamily.org

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 6:52:02 AM

---

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

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Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Arthur Bottomley  
3901 Summit Ridge Circle  
Depoe Bay, OR 97341  
artbottomley@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 6:52:24 AM

---

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Dear Nicole Singh,

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Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Eric Johansen  
22095 SW Taylors Dr  
Tualatin, OR 97062  
ej51jj@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 6:56:58 AM

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Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Bethany Hansen  
2617 NE Nova ave  
Hillsboro, OR 97124  
dbhansenfamily@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 6:57:06 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Stephanie Heisler  
5706 NE 31st Avenue  
PDX, OR 97211  
sheisler6@comcast.net

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 6:57:36 AM

---

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

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Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
John Adams  
1696 SE Loganberry Street  
Dallas, OR 97338  
pjadams41@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 6:58:03 AM

---

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

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Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Elizabeth Kohler  
6655 NW Burgundy dr  
Corvallis, OR 97330  
ekohler159@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 6:58:22 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

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Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Randy Springer  
2928 Heron Loop SE  
Albany, OR 97322  
randy.springer@comcast.net

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 6:59:11 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

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Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Mitch Boyce  
183 Furnace St  
Lake Oswego, OR 97034  
slupilot@comcast.net

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 7:01:17 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

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Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
John Dunn  
11639 SW 33rd Place  
Portland, OR 97219  
johntdunnjr@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 7:03:04 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

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- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

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Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Skip Stanaway  
12350 SW Myslony  
Tualatin , OR 97062  
skipstanaway@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 7:06:26 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

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Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Richard Maloney  
589 Eagle Feather St NW  
Salem, OR 97304  
richard.d.maloney@outlook.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 7:06:35 AM

---

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

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Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Karen Haley  
15890 SW Bridle Hills Dr  
Beaverton, OR 97007  
karenhaley5@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 7:07:09 AM

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Dear Nicole Singh,

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Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Andrew Moseley  
17532 SE Colina Vista Ave.  
Milwaukie, OR 97267  
fjord.mess.0d@icloud.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 7:08:58 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

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Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Harriet Bing  
717 SE 16TH AVE  
PORTLAND, OR 97214  
harrietbing@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 7:11:03 AM

---

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

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Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Diana Miller  
11823 SW 128th Ave  
Tigard, OR 97223  
robndimiller@comcast.net

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 7:13:35 AM

---

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Dear Nicole Singh,

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Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Primdath Bharath  
4544 SE Lone Oak  
Hillsboro, OR 97123  
p2squared19@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 7:13:37 AM

---

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Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
kristina harvey  
5756 Valleywood SE  
Salem, OR 97330  
sisseeones@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 7:16:56 AM

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Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Carl Mendenhall  
5535 NE Mineral Springs Rd  
Carlton, OR 97111  
cfmendenhall@hotmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 7:17:57 AM

---

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Dear Nicole Singh,

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Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Aundra Asmussen  
515 SE 12th Street  
Troutdale, OR 97060  
aundra\_e@yahoo.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 7:22:03 AM

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Dear Nicole Singh,

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Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Connie Foster  
358 NW Hillcrest Loop  
MCMINNVILLE, OR 97128  
conniesfoster@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 7:23:27 AM

---

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Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Jason DiSenso  
4172 Heavens Way S  
Salem, OR 97302  
jdisenso@comcast.net

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 7:23:32 AM

---

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Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
D Denuccio  
9770 SW Buckskin Ter  
Beaverton, OR 97008  
Denuccio8@hotmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 7:28:49 AM

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- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Sandra Anderson  
PO Box245  
Aurora, OR 97002  
oldmolds@gmail.com

**From:** [moffisquita](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Climate rulemaking  
**Date:** Saturday, October 7, 2023 7:30:04 AM

---

You don't often get email from moffisquita@gmail.com. [Learn why this is important](#)

**Please stop increasing our costs with these futile efforts to stop what is cyclical natural climate change. Take a lesson from the Earth... Adapt!**

Sent from my T-Mobile 5G Device

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 7:31:01 AM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Ted Pratt  
5938 coquille court n.e.  
Albany, OR 97321  
pratter777@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 7:34:53 AM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Philip Cartozian  
12540 SW Harlequin Drive  
Beaverton, OR 97007  
cartozianp@comcast.net

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 7:35:04 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
brad busey  
1110 manzanita st. n.e.  
keizer, OR 97303  
bradbusey@comcast.net

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 7:37:15 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Erick Van Abkoude  
3975 NW Elizabeth Pl  
Corvallis, OR 97330  
rvanabkoude@comcast.net

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 7:37:41 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Lisa Schwarz  
19311 Towercrest Dr  
Oregon City, OR 97045  
lpsch5864@comcast.net

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 7:38:31 AM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Ryan Thomas  
PO Box 592  
Springfield, OR 97477  
rthomasconst@yahoo.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 7:42:02 AM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Ronald Hoff  
50573 Hillcrest Drive  
Scappoose, OR 97056  
qballhoff@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 7:43:45 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Nicholas Bassis  
1828 WESTHAVEN AVE NW  
Salem, OR 97304  
NICHOLASWBASSIS@GMAIL.COM

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 7:43:51 AM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Lynn McKelvey  
22680 Clark st  
West Linn, OR 97068  
Lynnmckelvey@hotmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 7:44:01 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

It seems that government officials learn nothing from their constituents or from other officials. Have you not noticed how many taxpayers are fleeing the West Coast because of the exorbitant taxes and surcharges and hidden upcharges that are happening? Please consider your families and retirees as you promote more and more expensive programs. This one on your plate now is the most expensive in the nation. Please think about ordinary people with ordinary incomes. We already have good programs that are costing us plenty.

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Charyla Olsen  
14635 SW Cabernet Ct  
Portland, OR 97224  
charylaj@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 7:44:04 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Susan McElfish  
16740 Southwest Marcile Lane  
Beaverton, OR 97007  
s2mcelfish@comcast.net

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 7:45:02 AM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
David Nakashimada  
19245 Provisioner Ln  
Oregon City , OR 97045  
dbnakas@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 7:46:03 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As a long-time Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program in its entirety. It does very little to help the environment in the context of vast pollution coming from China and India, but it does unfairly place a burden on senior citizens.

I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.

- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Richard Campbell  
16423 SW Luke Ln  
Tigard, OR 97223  
ricksax@comcast.net

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 7:48:14 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
James Mitchell  
1188 Irving Ave  
Astoria, OR 97103  
jmaracnet@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 7:49:21 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Jenny John  
95 East 25th  
Eugene, OR 97405  
Hairqueenisme@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 7:49:29 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Glenn Le Vernois  
10516 N.W La Cassel Crest Lane  
Portland, OR 97229  
glevernois@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 7:50:53 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
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- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Cliff Stephens  
333 SE 65th Ave  
Portland, OR 97215  
czrs@comcast.net

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 7:52:01 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
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Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Wilson Clow  
709 FIR GARDENS ST NW  
SALEM, OR 97304  
nafiwclw49@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 7:52:18 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

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Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Julie Valenti  
5320 Summit St  
West Linn, OR 97068  
valenti9938@comcast.net

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 7:54:56 AM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
John Quirk  
1280 SW Orinda Way  
Portland, OR 97225  
pdxquirk@yahoo.com

**From:** [Diane Engelhardt](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rule Making  
**Date:** Saturday, October 7, 2023 7:59:32 AM

---

You don't often get email from williadi@jeffnet.org. [Learn why this is important](#)

Dear Sir, I would like to register my concern regarding any decrease in regulations for emissions in our current climate crisis problem. We are speaking of a huge crisis in our world with little time to reverse things. Therefore I would like to request:

- Restricting biomethane (aka renewable natural gas (RNG) and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians.
- Strengthening emissions reduction requirements for new or expanded large industrial facilities in Oregon under the CPP's Best Available Emissions Reduction (BAER) program.

Sincerely,  
Diane Williams Engelhardt

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 8:03:37 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Peter Ravagni  
12507 SE MADISON ST  
PORTLAND, OR 97233  
ingavar@gmail.com

**From:** [Maggie Shreve \(maggieshreve@charter.net\) Sent You a Personal Message](mailto:maggieshreve@charter.net)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Saturday, October 7, 2023 8:07:22 AM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

Time to focus on our environmental and human health

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Maggie Shreve  
9161 Upper Applegate Road  
Jacksonville, OR 97530  
maggieshreve@charter.net  
(541) 973-1328

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 8:09:53 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Steve Gump  
845 SE 136th Ave.  
Portland, OR 97233  
stevenraygump@yahoo.com

**From:** [Mary Jo Tyler](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Public comment  
**Date:** Saturday, October 7, 2023 8:11:14 AM

---

You don't often get email from [mojoty1@gmail.com](mailto:mojoty1@gmail.com). [Learn why this is important](#)

DEQ should not impose geographic limits for renewable natural gas projects. This seems short sighted. Replacing gas with electricity which also uses fossil fuels to produce is not efficient nor solve tge problem.

Mary Jo Tyler  
Oregon citizen

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 8:16:05 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Peter Turner  
3310 SE 34th CT  
Lincoln City, OR 97367  
awenydd1122@yahoo.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 8:22:29 AM

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Dear Nicole Singh,

PLEASE LISTEN, As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
don perepchuk  
2575 meridian ct  
woodburn, OR 97071  
perep@aol.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 8:23:50 AM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Daavid McNeel  
15711 S. Henrici Rd  
Oregon City, OR 97045  
davemcneel@msn.com

**From:** [Michael Orendurff](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Please strengthen proposed 2023 climate rules  
**Date:** Saturday, October 7, 2023 8:24:21 AM

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You don't often get email from morendurff@hotmail.com. [Learn why this is important](#)

Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and

Michael Orendurff  
432 Parkside Drive  
Ashland, Oregon  
97520

would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane or hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 8:29:45 AM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Michael Garcia  
2415 Liberty St SW  
Albany, OR 97321  
bennybeaver4@msn.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 8:31:17 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Daniel Flores  
594 NE 58th Ave  
Hillsboro, OR 97124  
Talosxx@yahoo.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 8:32:03 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Fred Burris  
3090 SW 180TH PL  
ALOHA, OR 97003  
fjbarris@comcast.net

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 8:33:56 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Dan Bajema  
16283 SW Stahl Dr  
Tigard, OR 97223  
dtb71@hotmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 8:34:57 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Rebecca Bajema  
16283 SW Stahl Dr  
Tigard, OR 97223  
Beccaluvscats@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 8:36:10 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Susan Cornutt  
12775 SW 76th Avenue  
Tigard, OR 97224  
suzezo2015@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 8:38:17 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Emily Horn  
2536 DeBok Road  
West Linn, OR 97068  
emsville@comcast.net

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 8:39:04 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Michael Rushfeldt  
708 SE 60th Ave  
Hillsboro , OR 97123  
rushfelm@frontier.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 8:39:05 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Suzie Budeau  
1644 SE Harney St  
Portland, OR 97202  
suzbud@q.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 8:43:42 AM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Marvin Owen  
23171 SW Greengate Place  
Sherwood, OR 97140  
marvin.owen@mac.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 8:43:54 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Lastly, please read the following articles that seem to indicate much, if not all that you are proposing is completely unnecessary.

[https://www.americanthinker.com/blog/2022/07/the\\_one\\_point\\_that\\_can\\_get\\_people\\_off\\_the\\_global\\_warming\\_obsession\\_train.html](https://www.americanthinker.com/blog/2022/07/the_one_point_that_can_get_people_off_the_global_warming_obsession_train.html)

[https://www.theepochtimes.com/us/nobel-winner-refutes-climate-change-narrative-points-out-ignored-factor-5486267?est=X%2Fff9zWdLPK5r7PucfsHe0sZg3WZETF2tDr8RpNV3atK90yK0jV6d62%2B%2BI0JJOQ%3D&src\\_cmp=mb-2023-09-10&src\\_src=Morningbrief](https://www.theepochtimes.com/us/nobel-winner-refutes-climate-change-narrative-points-out-ignored-factor-5486267?est=X%2Fff9zWdLPK5r7PucfsHe0sZg3WZETF2tDr8RpNV3atK90yK0jV6d62%2B%2BI0JJOQ%3D&src_cmp=mb-2023-09-10&src_src=Morningbrief)

<https://www.theepochtimes.com/world/rising-temperatures-pose-no-existential-threat-to-humanity-says-new-un-climate-change-chief-5436275?autoemail=richeycom%40gmail.com>

[https://www.washingtontimes.com/news/2022/feb/16/editorial-going-off-half-cocked-over-carbon/?traffic\\_source=Connatix](https://www.washingtontimes.com/news/2022/feb/16/editorial-going-off-half-cocked-over-carbon/?traffic_source=Connatix)

<https://www.thecollegefix.com/more-than-1600-scientists-and-other-scholars-sign-no-climate-emergency-declaration/>

Sincerely,  
Lee Richey  
17911 SW 105th Court  
Tualatin, OR 97062  
richeycom@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 8:45:23 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Melanie Evans  
1629 Patty Ave NE  
Keizer, OR 97303  
cmssc\_cpcs@yahoo.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 8:45:47 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

I've lived in Lake Oswego for 35 years and have had numerous situations in which having a gas stove and a gas fireplace saved us from freezing!

There have been multiple times power was lost and just 2 years ago we were without power for 9 days while living within the city limits. Had it not been for natural gas being available for some heat (one room) and cooking, we would have been forced to leave our house for at least a week. As it was, our room temperatures dipped to below 45 degrees. Your restrictions on gas appliances violates every common sense plan for multiple back-ups for emergencies. I honestly don't know why you are pushing the illogical rules you have on your agenda.

I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Harold Rust  
18280 Delenka Lane  
Lake Oswego, OR 97034  
hlrust88@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 8:45:55 AM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Anton Ivanov  
15140 NW Perimeter Drive  
Beaverton, OR 97006  
aivanov61@yahoo.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 8:46:01 AM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Rick Wilkinson  
3221 Siuslaw ave ne  
Albany , OR 97321  
tandrwick@msn.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 8:46:03 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Rick Wilkinson  
3221 Siuslaw ave ne  
Albany , OR 97321  
tandrwick@msn.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 8:47:00 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Deanna Gold  
6039 NE 34th Ave.  
Portland, OR 97211  
dgoldsf@yahoo.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 8:47:59 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Tom Haeg  
2131 Pippin St. NE  
Salem, OR 97305  
haegtm@aol.com

**From:** [Cathy Sampson Kruse](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Saturday, October 7, 2023 8:47:59 AM

---

You don't often get email from ulla1855@gmail.com. [Learn why this is important](#)

Dear 2023 DEQ Climate Rulemaking,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane (aka renewable natural gas (RNG)) used for CPP compliance to that which produces direct benefits for Oregonians – projects that reduce pollution in Oregon.
- 2) Disallowing hydrogen to be used for CPP compliance unless it is green electrolytic hydrogen (made from renewable energy sources like solar and wind). Why? Not all hydrogen is created equally. Where and how it is produced and used matters significantly when it comes to emissions reduction – if it's produced from fossil fuels out-of-state, it could be more polluting than even natural gas.
- 3) Strengthening emissions reduction requirements for new or expanded large industrial facilities in Oregon under the CPP's Best Available Emissions Reduction (BAER) program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they

benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

OR

Sincerely,  
Cathy Sampson Kruse  
301 Otter Rock Drive  
Otter Rock, OR 97369

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 8:48:57 AM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Lee Cordner  
487 Lanthorn  
Gearhart, OR 97138  
Lee.cordner@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 8:50:20 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

Dear Sirs: I use my gas stove for many purposes that could not be achieved with electric stoves only. Several of my children have electric stoves and they see how much more versatile and safe and useful natural gas is. We all wonder why you have this "need" to create big roadblocks to the use of gas! It doesn't make sense what you are proposing.

I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Patricia Rust  
18280 Delenka Lane  
Lake Oswego, OR 97034  
patriciarust5@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 8:51:26 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Patricia Franklin  
795 N 2ND ST  
Jefferson, OR 97352  
ama2escjt@gmail.com

**From:** [Chris Becker \(cbeck7@gmail.com\) Sent You a Personal Message](mailto:cbeck7@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Saturday, October 7, 2023 8:52:50 AM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Chris Becker  
874 W 16th Ave  
Eugene, OR 97402  
cbeck7@gmail.com  
(541) 231-4405

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Diane Meisenhelter \(meissun@hotmail.com\) Sent You a Personal Message](mailto:meissun@hotmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Saturday, October 7, 2023 8:54:07 AM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

Do not allow ?renewable offset loopholes? that foster industries paying to pollute. We have a short timeframe to substantially reduce emissions and so-called renewables and industry self-reporting are both incredibly problematic on so many levels.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon?s cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ?s current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of ?book and claim? accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP?s Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Diane Meisenhelter  
4626 ne 19th ave  
Portland, OR 97211  
meissun@hotmail.com  
(503) 349-1460

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415)

977-5673.

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 8:54:22 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Rick Baggett  
14388 S Maple Lane Rd  
Oregon City, OR 97045  
baggettpv@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 8:56:53 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Elizabeth Treacy  
947 W. 11th Ave  
Eugene, OR 97402  
treacyducks@yahoo.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 8:57:37 AM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase my cost of living by imposing ridiculous geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians. You do not represent me appropriately.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change. Do not price me out of Oregon State.

Sincerely,  
Michael Kerwin  
1452 Grand Ave  
Astoria, OR 97103  
michaelakerwin@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 8:57:59 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Brian Lockhart  
2620 SE 176TH PL  
PORTLAND, OR 97236  
blockhart5@comcast.net

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 8:59:39 AM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Michael Haberkorn  
631 St. Andrews Loop  
Creswell, OR 97426  
mikehaberkorn@me.com

**From:** [Melissa Wild-Lohnes \(twinkletoeshiking@gmail.com\)](mailto:twinkletoeshiking@gmail.com) Sent You a Personal Message  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Saturday, October 7, 2023 9:02:00 AM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

No more offsets for polluters!

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Melissa Wild-Lohnes  
19725 Aspen Meadows Dr.  
Bend, OR 97702  
[twinkletoeshiking@gmail.com](mailto:twinkletoeshiking@gmail.com)  
(971) 217-1948

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 9:06:05 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Mike Simas  
6203 N Lovely ST  
Portland, OR 97203  
orchisroot@centurylink.net

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 9:06:50 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Yvonne Smith  
31161 SW Willamette Way W  
Wilsonville , OR 97070  
yvonne.smith1@yahoo.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 9:11:53 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Alvin Koppenhafer  
37961 Sunset St  
Sandy, OR 97055  
lckopp@live.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 9:13:23 AM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Jim Johnston  
10932 SW Chateau Ln  
Tigard, OR 97224  
engrjim@comcast.net

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 9:13:37 AM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Zeno Kopecky Jr  
1710 NW Jennifer Pl  
Portland, OR 97229  
z.kopecky@comcast.net

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 9:19:58 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Brian R Kern  
395 Walnut Lane  
Eugene , OR 97401  
[Brian@Kern-Family.org](mailto:Brian@Kern-Family.org)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 9:21:51 AM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Steve Woodward  
5156 Kensington Ct. NE  
Keizer, OR 97303  
woody258@yahoo.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 9:24:42 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Jeanne Hogan  
1215 Crescent Dr SW  
Albany, OR 97321  
tkohogan@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 9:25:22 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Randy Hogan  
1215 Crescent Dr SW  
Albany, OR 97321  
ben4lr@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 9:25:43 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

Our family enjoys cooking with clean, natural gas and heating our home with a new highly efficient natural gas furnace.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.

- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change. Limiting the supply of any commodity raises the price to the consumer. We are suffering enough from rising prices.

Sincerely,  
Kenneth Marshall  
2697 Broadway St. NW  
Albany, OR 97321  
[ken@vintagerealtynw.com](mailto:ken@vintagerealtynw.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 9:27:33 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Greg Bosin  
91559 Railroad Rd.  
Warrenton, OR 97146  
gbosin@charter.net

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 9:27:41 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Marjorie Proctor  
19865 NW Paulina Dr  
Portland, OR 97229  
margeproctor@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 9:35:42 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Raoul Russ  
620 NW 176th Ct  
Beaverton, OR 97006  
raoulruss@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 9:35:43 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
James Colley  
6088 NE Coquille Court  
Millersburg , OR 97321  
Jecolley@comcast.net

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 9:36:30 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Roger Holloway  
6431 GLEN ECHO AVE  
GLADSTONE, OR 97027  
rohoduck@aol.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 9:42:09 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
allen vandecoevering  
1122 heritage loop  
stayton, OR 97383  
vande9@wavecable.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 9:47:42 AM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
John Altshuler  
2910 Grand Cayman Dr  
Eugene, OR 97408  
tomailakai@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 9:48:02 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Dave Traweek  
7756 SW Landau ST  
Portland , OR 97223  
dave.traweek@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 9:53:16 AM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Mike Hickey  
15280 se 262nd ave  
Boring, OR 97009  
waterboymike@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 9:58:30 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Thomas Campbell-Schmitt  
9708 SW 59TH AVE  
PORTLAND, OR 97219  
tandpcs@comcast.net

**From:** [Jill Hunter](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rule making  
**Date:** Saturday, October 7, 2023 9:59:01 AM

---

You don't often get email from [jillhunter5515@gmail.com](mailto:jillhunter5515@gmail.com). [Learn why this is important](#)

I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.

- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on **quantifiable** solutions to address climate change.

Again, I urge DEQ **not to further increase costs by imposing geographic limitations on renewable natural gas (RNG)** because more opportunities for development will increase supply and drive costs down.

Jill Hunter

Sent from my iPhone

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 10:04:28 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

Those arbitrary geographic boundaries don't make sense and will likely increase costs for Oregonians, would be like excluding wind and solar resources from outside of Oregon (preventing meeting clean electricity goals) and finally would limit carbon reduction opportunities.

Sincerely,  
Joyce Attig  
5536 SW Bluestem Pl  
Corvallis , OR 97333  
Jattig46@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 10:09:19 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Sue Wright  
1857 SE 106th Ave  
Portland, OR 97216  
wright550@comcast.net

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking comment about climate protection program  
**Date:** Saturday, October 7, 2023 10:10:56 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

I am extremely concerned about the cost of the climate protection program. The cost to live in Oregon has become prohibitive and my children are considering moving based on affordability. I'm also concerned about the effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Amy Burroughs  
3423 SE Flat Tail Ln  
Milwaukie, OR 97267  
burroughsfam@msn.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 10:19:09 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Danne Edgecombe  
29644 Dane Ln  
Junction City, OR 97448  
rvdude1@msn.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 10:19:35 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Lance Berkey  
2491 Tracy Lane Woodburn, Or 97071  
Woodburn, OR 97071  
lberkey@hubbardchevrolet.com

**From:** [Julia Cuellar Dahl \(joolueuh47@gmail.com\) Sent You a Personal Message](mailto:joolueuh47@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Saturday, October 7, 2023 10:20:47 AM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Julia Cuellar Dahl  
14239 sw Teal Blvd.  
Beaverton, OR 97008  
joolueuh47@gmail.com  
(503) 621-6572

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 10:25:36 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Richard Burke  
192 NW Canyon Drive  
Dundee, OR 97115  
rl\_burke@wycliffe.org

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 10:26:06 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Pamela F Roberson  
PO Box 354  
Molalla, OR 97038  
rosy99cheeks@hotmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 10:28:25 AM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
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Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Brian Roth  
12042 SE Sunnyside Rd, #555  
Clackamas, OR 97015  
rescudiver1@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 10:31:05 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Erick Lurie  
15444 SE Adair Pl.  
Clackamas, OR 97015  
e.lurie@comcast.net

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 10:31:18 AM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Jim Skaggs  
2410sw182nd av  
Aloha, OR 97003  
jamska47@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 10:33:01 AM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Marion Lurie  
15444 SE Adair Pl.  
Clackamas, OR 97015  
Shaniko57@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 10:40:09 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Kat Neely Jones  
4275 MACLEAY RD SE  
SALEM, OR 97317  
otter58@comcast.net

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 10:40:43 AM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Margi Chesbro  
7037 SE Thorburn Street  
Portland , OR 97215  
Margichesbro@outlook.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 10:42:39 AM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

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- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Brett Chesbro  
7037 SE Thorburn Street  
Portland , OR 97215  
Bchez@comcast.net

**From:** [dave.kost@comcast.net](mailto:dave.kost@comcast.net)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Climate Protection Program  
**Date:** Saturday, October 7, 2023 10:43:40 AM

---

You don't often get email from [dave.kost@comcast.net](mailto:dave.kost@comcast.net). [Learn why this is important](#)

To Decision-makers at DEQ:

I am very concerned about the Oregon State government over-reacting to the climate change issue & pursuing solutions that are over-reaching and far too costly. I am a strong supporter of being good stewards of the environment, and I do my best to live consistently with that. I want my government to do that as well.

However, I believe we need to ensure that when we are addressing issues such as the effects of climate change, we do not pursue solutions that are worse overall than the problem. In my opinion government should NOT be outlawing natural gas for residential or commercial use. It should also NOT be outlawing vehicles that run on petroleum products. Incentives are one thing, making these things illegal is another. I also understand that there are many other facets of this issue and many solutions in play. It is not a simple issue.

We need to ensure that the costs of the proposed solutions are sustainable for ALL Oregonians, especially those in lower income brackets. We need to ensure that viable, cost-effective alternatives are developed and available to ALL Oregonians before we mandate switching to those alternatives. We need to ensure we are not jeopardizing the health of the state's budget & that those entrusted with funding for the chosen solutions are accountable in meaningful, verifiable ways for the spending & results. And we need to find ways to pursue these goals without increasing the tax burden on individuals or business.

Thank you for considering my thoughts.

Sincerely,

Dave Kost  
Aloha, OR



Virus-free. [www.avg.com](http://www.avg.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 10:44:13 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Ryan Thomas  
14467 SE Lyon Ct  
Happy Valley, OR 97086  
rmtdc02@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 10:45:43 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
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Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Paul Gale  
1373 SE 8th Ave  
Canby, OR 97013  
gale-stuff@canby.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 10:47:38 AM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

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Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Dan Giarrusso  
2856 Tulip St  
Eugene , OR 97408  
Dan@marshallsinc.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 10:49:39 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

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Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
M Gimbal  
Eugene St  
Hood River, OR 97031  
zazuToss@outlook.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 10:57:53 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
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Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Christopher Nosack  
7510 SW 208th Pl  
Beaverton, OR 97007  
poli@nosack.org

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 10:58:37 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

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Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Rick Schermerhorn  
1903 SW Abercrombie Pl  
Portland, OR 97225  
rscherm7@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 11:02:30 AM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
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Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Eric Johnson  
1977 NW JETTY AVE  
Lincoln City, OR 97367  
rericjohnson1982@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 11:03:26 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
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Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
James Konieczny  
18710 s Forest Grove Loop  
Oregon City , OR 97045  
Lbah2c@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 11:05:32 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

Just stop trying to save the climate.

It is NOT an issue! It is only a money grab. The climate has always changed. It will always change.

Just resist the urge to bilk us of our hard-earned money.

Sincerely,

Pamela Blake

4350 Sacramento Ct. NE

Salem, OR 97305

pamelablake1872@hotmail.com

**From:** [Alice Duff](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Comments on Climate Protection Program  
**Date:** Saturday, October 7, 2023 11:08:50 AM

---

You don't often get email from [aliceduff3@gmail.com](mailto:aliceduff3@gmail.com). [Learn why this is important](#)

## What is your response to this concern?

Compared to other climate programs, **DEQ's price per ton of CO2 is the most expensive in North America.** And costs will increase over time as requirements to reduce emissions become more stringent. DEQ should leverage the lowest-cost and most available resources for Oregonians and **not** include geographic limits for renewable natural gas projects.

## And this:

For the past several years, NW Natural has presented feedback and serious concerns to DEQ; those concerns about quantifiably reducing emissions have not yet been addressed. Every dollar spent needs to be invested in effective solutions to lower emissions with transparency and accountability.

It seems to me the State of Oregon is ramming through their own agenda (wanting to be 'a leader'), without caring about the average person who needs to heat their house affordably and effectively. You include trendy phrases such as environmental justice. You say that your "co-benefits and equity assessment found that *overall*, the Climate Protection Program *could* result in positive co-benefits and equity benefits. The design and *implementation of the Community Climate Investment funds was a key driver of these results.*" What happens if the Community Climate Investment program doesn't happen? And you even hedge by saying that the Program *could* result in positive benefits, so it's not even certain. That seems to be gambling with taxpayer money.

Regarding your estimates for implementation costs to the State, you make it sound as if one or two employees *may* have to spend a few hours on dealing with this program, which is undoubtedly an understatement. Your dept has already spent untold manhours designing, developing and presenting this plan, and you *will* require staff to implement and maintain this program -- all funded by taxpayers.

You say you "evaluated whether the proposed rule would have an effect on the development cost of a 6,000 SF parcel and construction of a 1,200 SF detached, single-family dwelling on that parcel. DEQ determined the proposed rule amendments will have no impact on the supply of housing or land for residential development. The proposed rule amendments will not impact the cost of labor or administration related to such development." That addresses new construction only. What about the vast majority of housing that already exists, which *will* be impacted by your new rules? You would prefer that those houses convert to something other than natural gas heating, but many people cannot afford to do that.

You also say that "DEQ recognizes that any proposed rule amendment that might increase compliance costs for individual fuel suppliers regulated by these programs could be passed on to customers. DEQ recognizes that some individual fuel suppliers may experience changes in the number of compliance instruments received from DEQ and this may increase costs for customers of individual fuel suppliers. This would be of additional concern for environmental justice communities that have fewer options to transition to other fuel sources and who spend a larger portion of their household budgets on energy and fuels." **We all know that any and all compliance costs to for-profit companies will always be passed on to**

consumers, yet you gloss over that.

And yes, I realize that my comments to you will be ignored.

Alice Duff  
Portland

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 11:10:41 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. Our climate has been changing since the earth was created and all of this bogus climate change protection is just hurting people. The major so called climate change models left out clouds and rain in their predictions. STOP, just STOP ALL of the climate change rules!

I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.

- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Robin Kilpatrick  
17750 SE Beebee CT  
Sandy, OR 97055  
[7greenmoose@gmail.com](mailto:7greenmoose@gmail.com)

**From:** [Martha Neuringer](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Saturday, October 7, 2023 11:17:03 AM

---

You don't often get email from martha.neuringer@gmail.com. [Learn why this is important](#)

Dear 2023 DEQ Climate Rulemaking,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane (aka renewable natural gas (RNG)) used for CPP compliance to that which produces direct benefits for Oregonians – projects that reduce pollution in Oregon.
- 2) Disallowing hydrogen to be used for CPP compliance unless it is green electrolytic hydrogen (made from renewable energy sources like solar and wind). Why? Not all hydrogen is created equally. Where and how it is produced and used matters significantly when it comes to emissions reduction – if it's produced from fossil fuels out-of-state, it could be more polluting than even natural gas.
- 3) Strengthening emissions reduction requirements for new or expanded large industrial facilities in Oregon under the CPP's Best Available Emissions Reduction (BAER) program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they

benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,  
Martha Neuringer  
25150 NW Ridge Rd  
Forest Grove, OR 97116

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 11:17:30 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Rebecca Haas  
5219 SE Belmont St.  
Portland, OR 97215  
[rebecca@revolutionportland.com](mailto:rebecca@revolutionportland.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 11:17:43 AM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Ron Friedman  
316 Quail Run Cir  
Woodburn, OR 97071  
rj.freed7@frontier.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 11:19:20 AM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Molly McFerran  
14108 SE 116th Ave  
Clackamas, OR, OR 97202  
molly@avantquattro.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 11:27:24 AM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Michael Ouhl  
272 Elliott Way  
Cannon Beach , OR 97110  
mwo272beach@yahoo.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 11:29:41 AM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
George Patterson  
597 Stagecoach Way SE  
Salem, OR 97302  
geopatterson@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 11:30:59 AM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Ron Carter  
3253 kentwood dr  
Eugene, OR 97401  
Carterron@comcast.net

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 11:35:11 AM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
David Pappel  
5890 Avalon St  
Eugene, OR 97402  
dwpappel@gmail.com

**From:** [Terry Harris](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** CCP  
**Date:** Saturday, October 7, 2023 11:35:59 AM

---

You don't often get email from grnbean2017@outlook.com. [Learn why this is important](#)

As a born and raised Oregonian, I want to strongly object to the Oregon DEQ's proposed illegal program to remove our gas powered cars and small engines, diesel engines, natural gas stoves, etc.

This "climate change" hoax is just that and you know it! All your alternative fuels will not meet the needs of Oregonians, leaving us vulnerable to cold, heat and costing us untold amounts of money to survive.

As long as China and India keeps pumping out their emissions it won't matter what we do. Our food supplies (plants) need CO2 to grow, you cut that out = no food! Studies (real scientific studies, not your made-up ones) have shown this program will make no difference even if we go to zero emissions .

Having a committee of climate activists from around the state will only present one side of this issue, which is a Left-wing Democrat project. What will be the cost to Oregon residents to be forced switch to your "alternative" sources? Who is going to pay for me to switch my gas stove, my gas clothes dryer, my only heat source - gas fireplace insert? How about my cars, lawnmower, motorcycles?? What accommodations will be made for disposal of all these items? Will it be like the dead windmills, burying them in landfills? That's really good for the environment!

Again, I totally object to your total emissions ban plan and hope you will look long and hard at this proposed plan and be honest with Oregonians about the total cost and detriment to our people and state!!

Sincerely,

Terry Harris  
Myrtle Point, Oregon

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Renewable Natural Gas Costs As Low As Possible  
**Date:** Saturday, October 7, 2023 11:59:38 AM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As a voting Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. This is a political decision and not effect when actual alternative costs are fully expensed. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Curtis Merz  
1047 Tyler Ave  
Cottage Grove, OR 97424  
OtterRock@gmx.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 12:02:22 PM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Jeff Woodford  
1690 S Edgewood St  
Seaside, OR 97138  
jeffedgewood57@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 12:03:04 PM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Steve Anderson  
3045 Liberty Street SW  
Albany, OR 97321  
steve55anderson@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 12:07:07 PM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Brent Dowty  
14752 nw forestel Loop  
Beaverton, OR 97006  
brenjdowty@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 12:17:10 PM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective. I am very opposed to any cap and trade system as this will also do nothing to reduce carbon emissions, it only disguises reported emissions to the public and raises cost.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals. Natural gas is our best option to use until a more consistent, reliable, sustainable, and truly environmentally conscious energy source can be attained.

- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Loren Beprestis  
928 se 174th Ave  
Portland, OR 97233  
Lbprist@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: We can't afford this!  
**Date:** Saturday, October 7, 2023 12:22:47 PM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

We can't afford our utilities now as we are retired and on a fixed income. With 17% increases in groceries, 27% increases in electric rates and 50+% increases in gasoline the past 2 years senior citizens are being asked to sacrifice our medicines and eat less just to keep from losing our homes.

Stop hurting the citizens of Oregon with these needless mandates that accomplish virtually nothing but cost us enormously in our ability to have even a modest life.

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Randall Brewer  
2577 NE 55th Pl  
Lincoln City, OR 97367  
rbrewer26@charter.net

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 12:24:34 PM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Edward Cole  
32471 S Kropf Rd  
Canby, OR 97013  
edc@yoderautosalvage.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 12:28:03 PM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Peter McCullough  
740 Kingwood Drive NW  
Salem, OR 97304  
pcmccullough@sonic.net

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 12:33:46 PM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Karen Klemme  
91031 S. Skinner St.  
Coburg, OR 97408  
karenklem@icloud.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 12:35:22 PM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Pat Miller  
8205 SW 191st Ave  
Aloha, OR 97007  
pat.k.miller@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 12:37:46 PM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Kirsten Ohm  
1510 SE Kelly Ave  
Gresham , OR 97080  
kirstenlo@msn.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 12:45:38 PM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Lois Hillemann  
1780 Fairmount Ave S  
Salem , OR 97302  
loishil@msn.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 12:50:18 PM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Greg Titamer  
1814 Silverstone Dr  
Forest Grove, OR 97116  
gtitamer@comcast.net

**From:** [Marie Jackson](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Saturday, October 7, 2023 12:51:03 PM

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You don't often get email from missy957@gmail.com. [Learn why this is important](#)

Help Oregon stay on track to meet its climate change goals. Please strengthen proposed rules by:

- Restricting biomethane (aka renewable natural gas and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians.
- Strengthening emissions reduction requirements for new or expanded large industrial facilities in Oregon under the CPP's Best Available Emissions Reduction (BAER) program.

Marie Jackson  
Crow, Oregon

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 12:54:20 PM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Kristi Conaway  
1341 Woodacre Drive  
Salem, OR 97302  
Kcconaway@hotmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 12:55:13 PM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

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Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Sue Hills  
375 SW Murray Blvd  
Beaverton, OR 97005  
sudsqueen@comcast.net

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 1:00:03 PM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
MardiLyn Saathoff  
14326 SE SUMMIT DRIVE  
CLACKAMAS, OR 97015  
Mardisaathoff@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 1:08:39 PM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

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Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Andrew Ridenour  
7442 N Foss Ave  
Portland, OR 97203  
ridenour.andrew@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 1:12:09 PM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Teresa Galloway  
11154 NW Ridge View Pl  
North Plains, OR 97133  
TERESA.GALLOWAY@COMCAST.NET

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 1:14:39 PM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Kathy Lambert  
3931 SE 28th Ave  
Portland, OR 97202  
kathy@lambert2.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 1:15:21 PM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Mike Piscitello  
1599, Rainbow Drive  
Springfield, OR 97477  
Michaelpiscitello@yahoo.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 1:16:56 PM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Thank you for considering my comments.

Sincerely,  
Jessica Zahnnow  
2558 NW Thurman Street  
Portland, OR 97210  
[jessica.zahnnow@gmail.com](mailto:jessica.zahnnow@gmail.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 1:20:22 PM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Johnathan Wan  
4251 SE KEIL ST  
Portland, OR 97222  
Johnathan.wan13@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 1:24:26 PM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
james pagel  
755 NE 201st Ave  
Fairview OR, OR 97024  
JAMESPAGEL@AOL.COM

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 1:24:37 PM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

I am submitting this, but I am going to be perfectly honest. I am so sick of the green agenda because it is a lie. Where does the electricity for electric cars come from? That would be natural gas and coal. So, is an electric car really electric? The answer is no. This whole climate thing is beyond ridiculous. First we were told we were going to freeze to death in the 80s, never happened. Now we are told we're going to boil to death, it also will not happen. Stop the madness and let the gas company alone please and stop jacking up prices as you try to influence the state in this what you call a clean energy direction which is not a clean energy direction at all. Global warming is one of the biggest lies ever told in history and it's disgusting.

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Kelly Guy  
17390 SW Kinglet Dr.  
Sherwood, OR 97140  
rseinc@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 1:25:10 PM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
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Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
SUSAN PIZZUTO  
755 ne 201st ave  
Fairview, OR, OR 97024  
jamespagel@aol.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 1:35:07 PM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
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Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Karen Grimes  
90119 Lakeview Drive  
Eugene, OR 97402  
karenleat@comcast.net

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 1:59:26 PM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

I am so sick of hearing about "Climate Change" because this is just a normal happening in the world. Granted China has been the number one polluter in the entire world as well as India. Stop this Green New Deal! It is just costing America too much money and costing jobs. We need to get back to being energy independent. Stop building the Wind Turbines! They are destroying wildlife and agriculture. That's all I have to say at the moment. Just sick and tired of hearing AOC and the swamp talk about Green Energy!

Sincerely,  
Kathleen Randall  
5530 SE 101st Ave  
Portland, OR 97266  
kathycatsrandall@yahoo.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 2:01:31 PM

---

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

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Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Roberta Powell  
12490 SW 27th St.  
Beaverton, OR 97008  
msropow@aol.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 2:05:17 PM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

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Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Many Oregonians have not recovered from the financial difficulties of Covid and many Oregonians are retired with limited budgets struggling to keep afloat during this inflationary period. Please do not add to the burden of Oregonians by increasing the cost of this necessity. There are many many other ways to reduce emissions that are more equitable to the citizens of our State.

Sincerely,  
Gloria Runyon  
14890 Penny Road NE  
Silverton , OR 97381  
gloriarunyon@duck.com

**From:** [gene.benke@gmail.com](mailto:gene.benke@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** DEQ rule makings  
**Date:** Saturday, October 7, 2023 2:14:36 PM

---

[You don't often get email from gene.benke@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Sent from my iPhone. Hello long time OREGON resident do not take away my Natural Gas use rights or increase taxes on the use ! Period ! Increase Taxes on people that use Green and charge enormous fees on the ones that use Green, like those that want Electric Vehicles and the like in their homes. What you might ask why ? BECAUSE THERE IS SCIENTISTS THAT REBUKE A CRISIS WITH CARBON ! I am sure you can use COMMON SENCE and SCIENCE ago prove CARBON will not change or KILL THE PLANET. Thanks for your consideration and please do the right and affordable decision for all the PEOPLE Gene Benke Linn County OREGON

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 2:18:46 PM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

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Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Ed Vachal  
286 NW Linneman Av  
Gresham , OR 97030  
Edvachal@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 2:21:09 PM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

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Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Russell La Barr  
14112 Conway Dr  
Oregon City, OR 97045  
maximuslabarr17@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 2:34:50 PM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

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Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Robert Weatherly  
37255 Agate Dr  
Lebanon, OR 97355  
rweatherb@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 2:35:57 PM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

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Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Patricia O'Riley  
4884 NW Promenade Terr.  
Portland, OR 97229  
patriciapdx@hotmail.com

**From:** [Shana Weeks \(mofrenchitoo@gmail.com\) Sent You a Personal Message](mailto:mofrenchitoo@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Saturday, October 7, 2023 2:45:01 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

If we don't work together to solve our environmental problems, you and your family will suffer the consequences right along with the rest of us. Let's work together on this.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Shana Weeks  
13765 SW Allen Blvd. Apt. 3  
Beaverton, OR 97005  
mofrenchitoo@gmail.com  
(971) 235-1349

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 3:04:24 PM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Bertram Busby  
2860 sw 209th ave Apt. 2  
Beaverton , OR 97003  
bertb32003@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 3:07:47 PM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As a 45-year resident of Oregon and struggling business owner, I have become increasingly alarmed by the rapid rise in taxes, fees, and other expenses related to the state's mandates for "climate protection."

Please do not further increase our financial burden by imposing geographic limitations on renewable natural gas. Even if this arbitrary rule actually could produce any meaningful reduction in carbon emissions (highly doubtful), it makes no sense from a cost/benefit standpoint. Instead of achieving "climate sustainability", rules like this make living and doing business in Oregon unsustainable.

I urge DEQ to carefully review the costs vs. benefits of any new mandates, recognize the importance of keeping costs down for struggling Oregonians, and focus your program on quantifiable solutions to address climate change.

Sincerely,  
William Symes  
6901 SE Oaks Park Way, Slip 5  
Portland, OR 97202  
wjsymes@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 3:08:58 PM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Joe Perry  
36100 Bohlken Dr.  
Lebanon, OR 97355  
jperry@dswebnet.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 3:19:44 PM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Tami Goertzen  
1555 FAIRGROUNDS RD NE  
SALEM, OR 97301  
tamigoertzen@hotmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 3:29:53 PM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Mark Fiser  
1690 McLean Blvd.  
Eugene, OR 97405  
markfiser@comcast.net

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 3:59:32 PM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Tomorhy Jondrow  
35895 Bryant Dr. SW  
Albany, OR 97321  
Tjames51@comcast.net

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 3:59:44 PM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
James Munson  
8042 Se 141st Ave  
Portland, OR 97236  
[jmbm.tin.box2662@gmail.com](mailto:jmbm.tin.box2662@gmail.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 4:14:52 PM

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You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Mollie Hotchkiss  
1295 S. 2nd Street  
LEBANON, OR 97355  
kitty6lover@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 4:16:28 PM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Blake Williams  
4500 NE Blue Heron Ct.  
Newberg, OR 97132  
[Blake.Williams@comcast.net](mailto:Blake.Williams@comcast.net)

**From:** [Gary Sumrak](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Climate Protection Program  
**Date:** Saturday, October 7, 2023 4:19:59 PM

---

You don't often get email from sumgj@charter.net. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane or hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of “book and claim” accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Sincerely – Gary and Janice Sumrak, 2485 Pinebrook Circle, Medford, OR 97504

**From:** Diane Chavez <campaigns@good.do>  
**Sent:** Saturday, October 7, 2023 4:24 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities my grandchildren will inherit.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP— a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18-month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system; and
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits— ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Diane Chavez

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This email was sent by Diane Chavez via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic

no-reply address at campaigns@good.do, however Diane provided an email address (dianedalychavez@gmail.com) which we included in the REPLY-TO field.

Please reply to Diane Chavez at dianedalychavez@gmail.com.

To learn more about Do Gooder visit

<https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.dogooder.co%2F&data=05%7C01%7CClimate.2023%40stateoforegon.mail.onmicrosoft.com%7Cb2d95b39c2a343fc979608dbc78c78a6%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C638323178368855785%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6I1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=FOEnMEtIaP1KYWobTqsl%2BZpybqRuwkPE6ZsI6B1n8hg%3D&reserved=0>

To learn more about web protocol RFC 3834 visit:

<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Ftools.ietf.org%2Fhtml%2Frfc3834&data=05%7C01%7CClimate.2023%40stateoforegon.mail.onmicrosoft.com%7Cb2d95b39c2a343fc979608dbc78c78a6%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C638323178368855785%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6I1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=K4gyuP3Va%2FGibOd6zpMOEPyd%2FaGkDSj4G1FsUFMizIE%3D&reserved=0>

**From:** [jamesg4170](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Greetings, my wife and I are retired. We can't just snap our fingers and and conjure up more money to fund unproven pipe dreams. When DEQ goes after our natural gas supply DEQ is hurting us. We heat our home, heat our water and cook our food with natur...  
**Date:** Saturday, October 7, 2023 4:33:40 PM

---

You don't often get email from jamesg4170@frontier.com. [Learn why this is important](#)

Sent via the Samsung Galaxy S10, an AT&T 5G Evolution capable smartphone

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 4:38:06 PM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Brek Splittgerber  
3930 Hampshire Lane  
Eugene , OR 97404  
breks@kw.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 4:46:23 PM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
David Brown  
5375 Tanoak Av SE  
Salem, OR 97306  
brownd77@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 4:52:22 PM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Lorna Pelcha  
10420 NW Cornell Rd  
Portland, OR 97229  
Lornapelcha@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 4:59:26 PM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Mark Gliebe  
18610 SE Clinton St  
Gresham, OR 97030  
Mark\_g97030@yahoo.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 5:04:16 PM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.

Case in point: Denmark is a great example. Country-wide development in turning organic waste streams into a climate solution has allowed Denmark to achieve 40% of its total gas use in homes and businesses as RNG, with their national goal of 100% RNG by 2030 – completely displacing fossil fuel use.

- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and promote use of oregon's agricultural waste into RNG, becoming the model for other states.

Sincerely,  
Catherine Holder  
217 S Pendleton St  
Portland, OR 97239  
[catherine.s.holder@gmail.com](mailto:catherine.s.holder@gmail.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 5:17:35 PM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Mark Kosmowski  
16179 SW Snowy Owl Lane  
Beaverton, OR 97007  
kosmowskim262@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 5:19:40 PM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Mark Enos  
5625 SE 145th Ave  
Portland, OR 97236  
enos.ma@gmail.com

**From:** [Carol Henning \(cahenn123@gmail.com\) Sent You a Personal Message](mailto:cahenn123@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Saturday, October 7, 2023 5:27:18 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Carol Henning  
2048 Whitmore Dr. NW  
Albany, OR 97321  
[cahenn123@gmail.com](mailto:cahenn123@gmail.com)  
(530) 680-9338

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 5:46:43 PM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Matthew Calderaz  
19432 Wilderness Drive  
West Linn, OR 97068  
beeofdoom@yahoo.com

**From:** [Elizabeth Warriner \(betsy@betsywarriner.com\) Sent You a Personal Message](mailto:betsy@betsywarriner.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Saturday, October 7, 2023 5:49:49 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

It is time to take serious action to reduce carbon pollution and the impacts of climate change.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Elizabeth Warriner  
119 NW Drake Road  
Bend, OR 97703  
[betsy@betsywarriner.com](mailto:betsy@betsywarriner.com)  
(541) 317-9065

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**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 6:03:28 PM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Kevin Bradley  
17718 SE Rose Street  
Milwaukie, OR 97267  
kevinb763@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 6:05:13 PM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Greg Wilson  
16350 SE Bel Air Dr  
Damascus , OR 97089  
fivewilson1@msn.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 6:05:44 PM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Stephen Farrar  
2915 PARK TER SW  
Albany, OR 97321  
stevefarrar@comcast.net

**From:** [Terence Shumaker \(shufly46@comcast.net\) Sent You a Personal Message](mailto:shufly46@comcast.net)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Saturday, October 7, 2023 6:16:00 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

It is critical that all industries be required to comply with all environmental regulations rather than getting a bye on certain requirements.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Terence Shumaker  
25430 Swiftshore Drive  
West Linn, OR 97068  
shufly46@comcast.net  
(503) 313-3910

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 6:21:27 PM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change. First of all let's call this what really has to do with. It's a money grab. Take a look what Oregon and Washington is are doing to their citizens. You are taking hard earned money and putting it into programs that have nothing to do with climate. Natural Gas is one of the cleanest fuels known to man, and you're trying outlaw it. That is rediculas! Build more Natural Gas fired power plants. Don't tare down anymore Clean Coal fired Power Plants. And for crying out loud, build some new Nuclear Power Plants. Let's put Nuclear Power Plants on the upcoming ballet and let the citizens be heard. That would be the best solution to your so called Climate Change Religion. Do Not increase taxes to pay for anymore of this insanity.

Sincerely,  
Bronner Smith  
1399 Gard3n Terrace Rd  
Seaside, OR 97138  
btstahoe@yahoo.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 6:34:29 PM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Donna Bleiler  
420 King St S  
Salem, OR 97302  
dbtalk2u@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 6:55:17 PM

---

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Donna Springer  
2928 Heron Loop S.E.  
Albany, OR 97322  
randyandonna@comcast.net

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 7:25:50 PM

---

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

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- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Mark Booth  
2524 SW Troy Street  
Portland, OR 97219  
markanddianabooth@comcast.net

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 7:43:16 PM

---

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Michael Sloan  
6218 SE Woodward St  
Portland, OR 97206  
hmagic2@aol.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 7:54:38 PM

---

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Peter Cook  
20329 Hoodview Avenue  
West Linn, OR 97068  
pcookdesign@yahoo.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Saturday, October 7, 2023 8:13:31 PM

---

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Barbara A Epidendio  
11520 SE Stanley Ave. Milwaukie OR. 97222  
Portland, OR 97222  
bepidendio@msn.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 9:01:02 PM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
David Osborne  
9455 SW 20th Pl  
Portland, OR 97219  
hhdave@comcast.net

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 9:30:38 PM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Douglas Rowe  
6631 SE Grace St  
Hillsboro, OR 97123  
dougro1@frontier.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 9:45:13 PM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
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- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Eric Terhaar  
237 NE 74 th  
Portland , OR 97213  
emterhaar@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 10:32:41 PM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
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- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Rebekah Jones  
38534 Barlow Pkwy.  
Sandy, OR 97055  
Beks-stuff@hotmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Saturday, October 7, 2023 11:18:38 PM

---

You don't often get email from constituent@civiclick.com. [Learn why this is important](#)

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
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- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Stephen Bianco  
5475 DEMARCO AVE  
EUGENE, OR 97402  
maristep@gmail.com

**From:** [Lark Valdini](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Sunday, October 8, 2023 12:03:28 AM

---

You don't often get email from le.valdini@gmail.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

However, I was disappointed to hear that the recent rule-making table did not include community input, and also that the results lacked in meeting the plan's original goals of reducing greenhouse gas emissions by 50%, providing meaningful investments to benefit Oregonians, and holding big polluters accountable.

Therefore, I am calling on the DEQ to adapt the rules for CPP implementation to focus on the original goals of:

- 1) Reducing greenhouse gas emissions and other air pollutants, maximizing public health benefits, and minimizing costs for consumers in environmental justice and other communities in Oregon.
- 2) Keeping economic and health benefits of the Community Climate Investment program in Oregon: investments should materially benefit Oregonians at the frontlines of pollution and the climate crisis, rather than paying for cheap offsets in other places.
- 3) Achieving real reduction of emissions by 50%, rather than allowing companies to invest in biomass-derived fuels such as "renewable natural gas" (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
- 4) Holding big polluters accountable to engage in science-based "best available emissions reductions" (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.
- 5) Returning the date for a "new source" of stationary pollution to December 31, 2021.

The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
Lark Valdini  
7745 SE 16TH AVE  
PORTLAND, OR 97202

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Sunday, October 8, 2023 5:47:35 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Linda Stevenson  
1925 Hillwood Ct S  
Salem , OR 97302  
Donovans-4@comcast.net

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Sunday, October 8, 2023 5:55:16 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Daniel Rhodes  
4421 SE Topaz Dr.  
Troutdale, OR 97060  
dan6454@aol.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Sunday, October 8, 2023 6:24:52 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Jill Van Gordon  
7612 SW Thornton Drive  
Wilsonville, OR 97070  
[jill.vangordon@yahoo.com](mailto:jill.vangordon@yahoo.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Sunday, October 8, 2023 7:29:24 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Thomas Mossberg  
3690 River Heights Dr  
Springfield, OR 97477  
tomwilmos@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Sunday, October 8, 2023 7:40:00 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Richard Mills  
850 NE Chehalem Dr  
Newberg, OR 97132  
[corgistuff@frontier.com](mailto:corgistuff@frontier.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Sunday, October 8, 2023 7:52:45 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Charles Rotta  
14680 SW 117th PL  
Tualatin, OR 97224  
[crotta@duck.com](mailto:crotta@duck.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Climate program: increasing rates more??  
**Date:** Sunday, October 8, 2023 8:21:44 AM

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Dear Nicole Singh,

Northwest Natural Gas has done the work and supplied you with a plan PROVEN to accomplish lowered emissions.

You are ignoring that? - and marching on to raise rates yet again?

We lower income citizens have had and still have NO protection against your department raising rates to what is already a significant burden on our finances.

We live very frugally (and spend responsibly) on a meager income obtained through honest hard labor!!

We plead with you to rethink, further research ideas and not just pull more money from our far too stretched budget as an easy answer.

Sincerely,  
Nick Kravchenko  
6655 sw. Florence lane  
Portland, OR 97223  
Jusrelaxin2@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Sunday, October 8, 2023 8:27:53 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Amanda Gray  
60 Jennings St  
Lebanon, OR 97355  
kapri540@hotmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Sunday, October 8, 2023 8:45:39 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
DONNA LOUX  
1200 SW Autumn Way  
Troutdale, OR 97060  
loux2275@comcast.net

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Sunday, October 8, 2023 8:48:27 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Shashi Dillion  
2257 Willion Lane SW  
Portland, OR 97201  
shahi.dillion@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Sunday, October 8, 2023 9:02:14 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Sheri Tellvik  
6679 SE Gladys Street  
Hillsboro, OR 97123  
stellvik@yahoo.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Sunday, October 8, 2023 9:12:07 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
DAVID STONE  
760 Wagon Wheel Dr.  
Lebanon, OR 97355  
enots2@juno.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Sunday, October 8, 2023 9:13:02 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Further, even if you accept the validity of the climate models predicting doom, your proposed solutions will have zero effect.

It is axiomatic that any policy or law that cannot accomplish its stated objective is bad and should be opposed.

Your proposal will drive up energy costs at a time when inflation is squeezing working people's budgets for no benefit. It will make everyone worse off for no benefit.

Do not pass foolish, expensive regulation to appeal to the fetishes of out of touch, wealthy elites.

Serve the people.

Sincerely,  
Jon Rivoli  
4151 Delightful Lane  
Silverton, OR 97381  
[jprivoli@gmail.com](mailto:jprivoli@gmail.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Sunday, October 8, 2023 9:16:45 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
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Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Lyle Vandestreek  
6015 SE Harrison St  
Portland, OR 97215  
lylev43@earthlink.net

**From:** [Paula Gordinier \(pgordi2@gmail.com\) Sent You a Personal Message](mailto:pgordi2@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Sunday, October 8, 2023 9:30:52 AM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Paula Gordinier  
590 Wimbledon Ct  
Eugene, OR 97401  
pgordi2@gmail.com  
(307) 286-3886

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Erika Bury \(threnody09@gmail.com\) Sent You a Personal Message](mailto:threnody09@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Sunday, October 8, 2023 10:48:31 AM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

Carbon offsets are not a solution to the catastrophe that is occurring. They are a shell game that just obscures the damage that is happening. We need real change now. 85 degrees in Portland in October isn't OK. Midsummer 116 degree heat domes aren't OK. Massive fires like the Eagle Creek fire that I witnessed while driving through the Columbia Gorge a few years ago aren't OK. Carbon offsets are a failed idea that corporations are using to cover up their damaging activities. We are in a climate emergency and it's time to act like it.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

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I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Erika Bury  
3617 NE 44th Ave  
Portland, OR 97213  
threnody09@gmail.com  
(503) 984-8546

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Sunday, October 8, 2023 10:49:58 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Dana Ramer  
11360 SW Cottonwood Ln  
Tigard, OR 97223  
Dpramer@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Sunday, October 8, 2023 10:54:06 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Tim Nichols  
2135 N Country Club Dr  
Canby , OR 97013  
[Odbgoldfish@web-ster.com](mailto:Odbgoldfish@web-ster.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Sunday, October 8, 2023 11:07:09 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Lynne Whittington  
4544 Wendover St.  
Eugene , OR 97404  
[Lynnehw5@aol.com](mailto:Lynnehw5@aol.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Sunday, October 8, 2023 11:13:56 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
E JOEL VANDESTREEK  
11670 SW 7TH ST.  
BEAVERTON, OR 97075  
ejoelv@yahoo.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Sunday, October 8, 2023 11:31:35 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Petr Blashchishchin  
10409 NE Oregon St  
Portland, OR 97220  
pete611@gmail.com

**From:** [Drew Miles \(dmiles220@gmail.com\) Sent You a Personal Message](mailto:dmiles220@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Sunday, October 8, 2023 11:40:40 AM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Drew Miles  
7524 NE Pacific St  
Portland, OR 97213  
dmiles220@gmail.com  
(847) 962-4482

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Sunday, October 8, 2023 11:55:40 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Erik Dunkle  
6164 SE HEIKE ST  
HILLSBORO, OR 97123  
[edunkle2112@frontier.com](mailto:edunkle2112@frontier.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Sunday, October 8, 2023 12:14:08 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Selina Barnes  
5177 Perry St NE  
Keizer, OR 97303  
sbarnes9312@gmail.com

**From:** Audrey DeKam <campaigns@good.do>  
**Sent:** Sunday, October 8, 2023 12:22 PM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18-month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system; and
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Audrey DeKam

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This email was sent by Audrey DeKam via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic

no-reply address at campaigns@good.do, however Audrey provided an email address (audie777@comcast.net) which we included in the REPLY-TO field.

Please reply to Audrey DeKam at audie777@comcast.net.

To learn more about Do Gooder visit

<https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.dogooder.co%2F&data=05%7C01%7CClimate.2023%40stateoforegon.mail.onmicrosoft.com%7C57f2bbd6af544d90860b08dbc833e75c%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C638323897483788188%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6I1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=fOUOINqaP7fQr2gz67r%2FMQxuM6niukP4jRdQHUCn%2Bms%3D&reserved=0>

To learn more about web protocol RFC 3834 visit:

<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Ftools.ietf.org%2Fhtml%2Frfc3834&data=05%7C01%7CClimate.2023%40stateoforegon.mail.onmicrosoft.com%7C57f2bbd6af544d90860b08dbc833e75c%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C638323897483943925%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6I1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=RMkKtkFBP9E%2FYjg7b6FVWotEIB%2B%2FNWHKL%2FPZjWOV9E%3D&reserved=0>

**From:** [robin\\_riseup](mailto:robin_riseup)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Sunday, October 8, 2023 12:47:10 PM

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[You don't often get email from missrb1969@riseup.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Rule Making Committee,  
October 8, 2023

I live in Eugene and we have had some very expensive run-ins with NW Natural Gas in the last few years, as we try to electrify our economy. They stonewalled the City for years, and then sabotaged our local process.

I see NW Natural Gas is one of the 12 “regulated” industrial corporations on your 14 member committee, with only two public interest members. How does this represent the interests of the citizens of Oregon? It was the public interest groups who worked to pass the CPP! These “regulated” industries fought the CPP the whole way – why should they now be in a position to decide how it works????

Here are some suggestions for you:

Your current concessions to regulated industries allow out-of-state RNG bio-methane investments and could enable the expansion of new large industrial emitters, defeating the goals of the Climate Protection Plan (CPP).

Also, strengthen the emissions reduction requirements for new or expanded stationary source facilities in Oregon under the BAER Act.

Also, strengthen requirements by restricting bio-methane used for CPP compliance to that which would produce direct benefits to Oregonians.

I'm very concerned that this type of mostly out of state investment would actually divert money from the Community Climate Investment fund, created specifically to focus on benefits to Oregonians.

Your rule-making is vital to ensure this program stays on track to achieve its stated climate, public health, and economic goals. You are in a crucial role to make sure this actually happens.

A worried Oregonian,  
Robin Bloomgarden  
3690 Wood Ave  
Eugene, OR 97402  
541-688-1820

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Sunday, October 8, 2023 1:48:53 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Anna Riggs  
8029 N Washburne Ave  
Portland , OR 97217  
[annakriggs@gmail.com](mailto:annakriggs@gmail.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Sunday, October 8, 2023 1:51:07 PM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
John Miller  
8205 SW 191st Ave  
Beaverton, OR 97007  
[john.fred.rick.miller@gmail.com](mailto:john.fred.rick.miller@gmail.com)

**From:** [Summer Boslaugh](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Sunday, October 8, 2023 2:07:15 PM

---

You don't often get email from sboslaugh@gmail.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

However, I was disappointed to hear that the recent rule-making table did not include community input, and also that the results lacked in meeting the plan's original goals of reducing greenhouse gas emissions by 50%, providing meaningful investments to benefit Oregonians, and holding big polluters accountable.

Therefore, I am calling on the DEQ to adapt the rules for CPP implementation to focus on the original goals of:

- 1) Reducing greenhouse gas emissions and other air pollutants, maximizing public health benefits, and minimizing costs for consumers in environmental justice and other communities in Oregon.
- 2) Keeping economic and health benefits of the Community Climate Investment program in Oregon: investments should materially benefit Oregonians at the frontlines of pollution and the climate crisis, rather than paying for cheap offsets in other places.
- 3) Achieving real reduction of emissions by 50%, rather than allowing companies to invest in biomass-derived fuels such as "renewable natural gas" (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
- 4) Holding big polluters accountable to engage in science-based "best available emissions reductions" (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.
- 5) Returning the date for a "new source" of stationary pollution to December 31, 2021.

The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
Summer Boslaugh  
2016 SE 41st Ave  
Portland, OR 97214

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Sunday, October 8, 2023 2:13:25 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Carolyn Birk  
10025 SW Coquille Dr  
Tualatin, OR 97062  
cbirk515@aol.com

**From:** [Wayne Potter](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Take action to ensure CCP is adopted to ensure effective solutions  
**Date:** Sunday, October 8, 2023 2:16:25 PM

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You don't often get email from keepmekurrent@gmail.com. [Learn why this is important](#)

It essential that the Climate Protection Program , CPP, be adopted so that it meets the standards of EO 20-04 be met. Any effort to delete the intent of 20-04 should be stopped. Please do not allow hydrogen to be produced unless it is produced with fuels developed from renewable fuels. Please do not continue to deploy any use of more fossil fuels.

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Sunday, October 8, 2023 2:45:58 PM

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Dear Nicole Singh,

I am writing regarding changes to the state's Climate Protection measures affecting natural gas. According to the IPCC's latest assessment, if we shut down ALL sources of CO2 in the world today it would make 0.01 deg C difference in 2100. That being the case, since in comparison to India and China's emissions ,which have increased 22% since the Paris accords and account for 37% of worlds emissions, any attempt to cut Oregon's 0.009% of the worlds emissions is just a tax on the poor of Oregon to enrich environmental rent seekers. BTW, without CO2 we'd all die.

Sincerely,  
Richard Patton  
10605 SE Steele Street  
Portland, OR 97266  
[rjpatton52@comcast.net](mailto:rjpatton52@comcast.net)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Sunday, October 8, 2023 3:01:51 PM

---

Dear Nicole Singh,

As an Oregonian, I'm concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. This will also greatly negatively effect poor and marginalized Oregonians by increasing the energy costs to a segment of the population least able to afford those increases. Please consider the trade offs before imposing this rule.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.

- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Jonathan Cutting  
1465 Bair Rd NE  
Keizer, OR 97303  
[cuttingjon@gmail.com](mailto:cuttingjon@gmail.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Sunday, October 8, 2023 3:15:01 PM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
John Brackeen  
1676 SE 3rd ST  
Astoria , OR 97103  
[jonnyfive75@gmail.com](mailto:jonnyfive75@gmail.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Sunday, October 8, 2023 3:24:22 PM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
HENRY SCHMID  
30249 South Meridian Road  
HUBBARD, OR 97032  
hankschmid@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Sunday, October 8, 2023 3:32:01 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Donald & Anna Lebold  
668 Garland Ct N  
Keizer, OR 97303  
[imeternallyhis@yahoo.com](mailto:imeternallyhis@yahoo.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Sunday, October 8, 2023 3:43:33 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Bud Stratton  
13747 SW Essex Dr  
Tigard, OR 97223  
WFSCKS2@CS.COM

**From:** [Robert Boston \(rbostonku@aol.com\) Sent You a Personal Message](mailto:rbostonku@aol.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Sunday, October 8, 2023 3:48:41 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

My wife and I oppose continuation of "offsets" used by dirty fuel users.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Robert Boston  
2011 se academy st  
dallas, OR 97338  
rbostonku@aol.com  
(503) 409-2709

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Anne Weiss \(likapika@aol.com\)](mailto:likapika@aol.com) Sent You a Personal Message  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Sunday, October 8, 2023 4:33:25 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

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- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Anne Weiss  
7320 S. East Mill St.  
Portland, OR 97215  
[likapika@aol.com](mailto:likapika@aol.com)  
(914) 924-2574

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Sunday, October 8, 2023 5:57:33 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

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- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

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Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Amy Sherwood  
1144 NW 120th Pl  
Portland, OR 97229  
[Sherwood.Amy@comcast.com](mailto:Sherwood.Amy@comcast.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Sunday, October 8, 2023 6:01:39 PM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Victor Cina  
1110 Parkside Ave  
Forest Grove, OR 97116  
[famiglia.fame.fede@gmail.com](mailto:famiglia.fame.fede@gmail.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Sunday, October 8, 2023 6:08:32 PM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

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Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Patricia Sampson  
1732 N 6th Ave  
Stayton, OR 97383  
[pattismpsn@gmail.com](mailto:pattismpsn@gmail.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Sunday, October 8, 2023 7:13:41 PM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
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Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Ron Servine  
14401 SE 215th Court  
Damascus, OR 97089  
ronservine@yahoo.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Sunday, October 8, 2023 8:36:43 PM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
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Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
lynda chambers  
707 Oak Street  
Brownsville, OR 97327  
[lynda\\_chambers@hotmail.com](mailto:lynda_chambers@hotmail.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Sunday, October 8, 2023 8:59:19 PM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

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Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Lynnette Luchaco  
12111 SE Ridgecrest Rd  
Happy Valley, OR 97086  
luchaco@comcast.net

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Sunday, October 8, 2023 9:27:46 PM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
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Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Joel Bender  
15835 S Lora Ct  
Oregon City, OR 97045  
JoelBender@hushmail.com

**From:** [Linda Sebring \(linda.sebring@gmail.com\) Sent You a Personal Message](mailto:linda.sebring@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Sunday, October 8, 2023 9:43:40 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

We have a chance to reverse the worst aspects of climate change only if we act now. We cannot waste time with useless or counterproductive actions. Paying to pollute is harmful and costs us all.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Linda Sebring  
631 NW 29th St  
Corvallis, OR 97330  
[linda.sebring@gmail.com](mailto:linda.sebring@gmail.com)  
(541) 829-1071

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Sunday, October 8, 2023 9:51:40 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
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- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Jeff Wiwatowski  
19084 Rusty Ter  
Oregon City, OR 97045  
[jwiwatowski@yahoo.com](mailto:jwiwatowski@yahoo.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Sunday, October 8, 2023 10:26:35 PM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

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Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Shayla Logue  
11265 SW 79th Ave  
Tigard, OR 97223  
[shayla.m.ebner@pfizer.com](mailto:shayla.m.ebner@pfizer.com)

**From:** [cordellbank@comcast.net](mailto:cordellbank@comcast.net)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Climate Protection Program:Please don't Weaken Rules  
**Date:** Sunday, October 8, 2023 10:49:28 PM

---

You don't often get email from cordellbank@comcast.net. [Learn why this is important](#)

To Whom It May Concern:

Please make the CPP as strong as possible. Anyone paying attention realizes how precarious our environment is, even if we do have the occasional period when things seems somewhat normal.

I have lived on my small woodlot for 20 years and have seen the decline in forest health on my property and our public and private forestlands. If we do not turn this decline around we're in for a very hard ride.

We should be vigorously pursuing all opportunities to slow the rate of global warming. As the Department of Environmental Quality, please don't assist those who are currently profiting from our energy crisis by weakening the Climate Protection Plan. If this happens, your department will have to be renamed the DNEQ...the Department of Non Environmental Quality.

Sincerely, A distressed citizen,  
Gail Cordell  
Oregon City OR

**From:** [John Giacoppe](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Sunday, October 8, 2023 10:59:46 PM

---

You don't often get email from maxamilliancyther@gmail.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

However, I was disappointed to hear that the recent rule-making table did not include community input, and also that the results lacked in meeting the plan's original goals of reducing greenhouse gas emissions by 50%, providing meaningful investments to benefit Oregonians, and holding big polluters accountable.

Therefore, I am calling on the DEQ to adapt the rules for CPP implementation to focus on the original goals of:

- 1) Reducing greenhouse gas emissions and other air pollutants, maximizing public health benefits, and minimizing costs for consumers in environmental justice and other communities in Oregon.
- 2) Keeping economic and health benefits of the Community Climate Investment program in Oregon: investments should materially benefit Oregonians at the frontlines of pollution and the climate crisis, rather than paying for cheap offsets in other places.
- 3) Achieving real reduction of emissions by 50%, rather than allowing companies to invest in biomass-derived fuels such as "renewable natural gas" (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
- 4) Holding big polluters accountable to engage in science-based "best available emissions reductions" (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.
- 5) Returning the date for a "new source" of stationary pollution to December 31, 2021.

The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
John Giacoppe  
7364 SE Division Street  
Portland, OR 97206

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Monday, October 9, 2023 2:01:24 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

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Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Thomas Behrens  
17360 SW Florence Street  
Aloha, OR 97078  
thomas.behrens7@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Monday, October 9, 2023 4:49:08 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

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Sincerely,  
Scott Hansen  
971 Marquet Way  
Eugene, OR 97401  
swhansen@comcast.net

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Monday, October 9, 2023 6:55:12 AM

---

Dear Nicole Singh,

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Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Mark Miller  
15382 SE Pioneer Dr  
Clackamas, OR 97015  
mmiller4412@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Monday, October 9, 2023 7:05:11 AM

---

Dear Nicole Singh,

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Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Kent Burnett  
1860 NW Laura Vista Dr  
Albany, OR 97321  
Office@kentburnettdds.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Monday, October 9, 2023 7:34:36 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

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Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
JAMES STURE  
4322 Barley Ct NE  
Salem, OR 97305  
[jjsture65@rocketmail.com](mailto:jjsture65@rocketmail.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Monday, October 9, 2023 7:35:40 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

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Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
John Wickham  
3222 VALLEY CREST WAY  
FOREST GROVE, OR 97116  
jgwickham@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Monday, October 9, 2023 7:53:51 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

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Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Peter Ittner  
1246 NE Parks Edge Circle  
Hillsboro, OR 97124  
[pete.ittner@outlook.com](mailto:pete.ittner@outlook.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Monday, October 9, 2023 8:00:26 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

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Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Jerry Hansen  
10465 SW Kent St  
Tigard, OR 97224  
[jerry@esp-nw.com](mailto:jerry@esp-nw.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Monday, October 9, 2023 8:06:10 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

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Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Becky Pettit  
295 Jessica Drive  
Forest Grove, OR, OR 97116  
bec\_pettit@hotmail.com

**From:** [SINGH Nicole \\* DEQ](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** FW: Comments on CPP proposed rules  
**Date:** Monday, October 9, 2023 8:16:18 AM

---

Nicole Singh (*she/her*)  
Senior Climate Policy Advisor, Office of Greenhouse Gas Programs  
Oregon Department of Environmental Quality  
503-869-2119  
[nicole.singh@deq.oregon.gov](mailto:nicole.singh@deq.oregon.gov)

---

**From:** TRAPP Lindsay \* DEQ <[lindsay.trapp@deq.oregon.gov](mailto:lindsay.trapp@deq.oregon.gov)>  
**Sent:** Sunday, October 8, 2023 11:41 AM  
**To:** SINGH Nicole \* DEQ <[Nicole.SINGH@deq.oregon.gov](mailto:Nicole.SINGH@deq.oregon.gov)>  
**Subject:** FW: Comments on CPP proposed rules

Another for you!

**Lindsay Trapp** (*she/her*)  
Environmental Quality Commission Policy Analyst & Assistant  
Oregon Department of Environmental Quality  
[lindsay.trapp@deq.oregon.gov](mailto:lindsay.trapp@deq.oregon.gov)  
Cell: 971-357-4893

---

**From:** Create Your Joy, Certified Life Coach <[createyourjoy@outlook.com](mailto:createyourjoy@outlook.com)>  
**Sent:** Saturday, October 7, 2023 9:56 PM  
**To:** TRAPP Lindsay \* DEQ <[lindsay.trapp@deq.oregon.gov](mailto:lindsay.trapp@deq.oregon.gov)>  
**Subject:** Comments on CPP proposed rules

You don't often get email from [createyourjoy@outlook.com](mailto:createyourjoy@outlook.com). [Learn why this is important](#)

To: Lindsay Trapp (*she/her*)

Environmental Quality Commission Policy Analyst & Assistant  
Oregon Department of Environmental Quality  
[lindsay.trapp@deq.oregon.gov](mailto:lindsay.trapp@deq.oregon.gov)  
Cell: 971-357-4893

TO: DEQ Rulemaking Group

RE: Comments on CPP proposed rules

Thank you for requesting that members of the public comment on the proposed rules for the Climate Protection Plan before you finalize them. The public has a huge stake in protecting the climate as so many of us feel the greatest effects when it is not protected. I am one of those people, and I have children, so am even more concerned about their future. Oregon should pull out all the stops to make their Climate Protection Program the best in the country. I want to be proud that I live here.

I am very concerned that you seem to have so many members on the Rulemaking Advisory Committee that represent financial interests tied to the regulated industries that the rule-making affects. It seems like too much of a conflict, so I hope you will listen to the public comments more than to the opinions of conflicted commenters and advisors. I am a resident who is very concerned about the lack of enough action on climate to stop the worst, and compounding effects of rapid climate change.

One thing I have heard is that you are allowing credits, similar to RECs in CA, for investments by a company like Northwest Natural Gas in biomethane projects outside of Oregon. That is really a mistake, as then this company does not have to do as much to switch out of natural gas to something less damaging to the atmosphere, like geothermal. Plus, with this way of giving credit, the benefits go out of state. We need to move fast towards stopping the use of natural gas here because methane that is released throughout its life cycle, from coming out of the ground through fracking, to its final use, is 80 times more powerful, (traps 80 times more heat than carbon dioxide), as a GHG in the first 20 years it is in the atmosphere. We have so little time to stop the tipping points; it may already be too late.

And I have heard you are making rules regarding the use of hydrogen, promoting its use as possibly a more sustainable source of energy. I do not believe it is much more than a distraction right now, but there may be some hydrogen that is created in a way that is green enough that it might be worth looking at. But your regulations must be very precise on what the definition of “green” is.

Gas companies all over the country are involved in strategies – worked out by a common lobbying group – to water down climate action regarding their current product. Please let the public, who overwhelmingly want the Climate Protection Program and want it to be very strong, see that you have not allowed it to be weakened by conflicted financial interests.

Thank you for reading this and giving me a chance to say what I am thinking about the Climate Protection Plan rule-making process.

J.A. Hutchins

P O BOX 7715

Eugene, OR

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Monday, October 9, 2023 8:25:47 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Ron Archer  
5224 SE 67th Ave  
Portland, OR 97206  
[rjarcher@celestica.com](mailto:rjarcher@celestica.com)

**From:** [M. Miller](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** rulemaking comment: please keep costs down  
**Date:** Monday, October 9, 2023 8:26:07 AM

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You don't often get email from matt@greshamsanitary.com. [Learn why this is important](#)

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ **not** to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because new opportunities for development across will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will **not** include geographic limits for decarbonized fuels like renewable natural gas and **will** allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,

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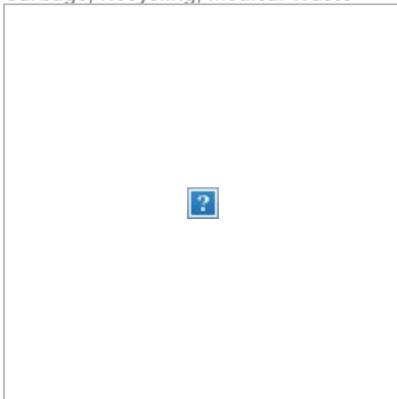
**Matt Miller**

Vice President: Gresham Sanitary Service Inc./ GSS Transfer LLC

Cell Phone: 503.209.3932

[Gresham Sanitary Service Inc.](#)

Garbage, Recycling, Medical Waste



**From:** [Scott Coash](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 9:10:06 AM

---

[You don't often get email from user@votervoice.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Scott Coash  
700 S B St  
Phoenix, OR 97535  
coash@charter.net

**From:** [DONA MCINTYRE](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 9:10:16 AM

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[You don't often get email from [d\\_dmcintyre@cbbmail.com](mailto:d_dmcintyre@cbbmail.com). Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

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Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

DONA MCINTYRE  
11655 SW Pixie Ln  
Culver, OR 97734  
[d\\_dmcintyre@cbbmail.com](mailto:d_dmcintyre@cbbmail.com)

**From:** [Dana Burk](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 9:10:19 AM

---

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Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

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Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Dana Burk  
854 Pinehurst Ave NE  
Keizer, OR 97303  
danaburk@comcast.net

**From:** [Rebecca Ruppert](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 9:10:22 AM

---

[You don't often get email from user@votervoice.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

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Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Rebecca Ruppert  
4825 Rising St SE  
Salem, OR 97302  
Sapphire4825@comcast.net

**From:** [Laura Erickson](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 9:10:22 AM

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[You don't often get email from [laura.erickson@coldwellbanker.com](mailto:laura.erickson@coldwellbanker.com). Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Laura Erickson  
46254 Lyons Mill City Dr  
Lyons, OR 97358  
[laura.erickson@coldwellbanker.com](mailto:laura.erickson@coldwellbanker.com)

**From:** [Mark Jones](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 9:10:24 AM

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[You don't often get email from user@votervoice.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

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Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Mark Jones  
321 NE 57th St  
Newport, OR 97365  
[mcmgjones@gmail.com](mailto:mcmgjones@gmail.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Monday, October 9, 2023 9:19:39 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Michael Larsen  
11322 Brandow St.  
Oregon City, OR 97045  
[mike.larsen@comcast.net](mailto:mike.larsen@comcast.net)

**From:** [Henry Mendazona](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 9:20:06 AM

---

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Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Henry Mendazona  
9180 Fruit Farm Rd  
Independence, OR 97351  
hmendazona@yahoo.com

**From:** [William McCormack](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 9:20:06 AM

---

[You don't often get email from user@votervoice.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

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Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

William McCormack  
1010 Donna Lynn Way  
Gladstone, OR 97027  
billvalmc@yahoo.com

**From:** [Steven Simpson](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 9:20:06 AM

---

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Dear Climate DEQ,

Why would anyone even consider restricting a source of energy used by the majority of Oregonian? My home is utilities are totally natural gas. Hit water, cooking and heat are all natural gas. This is all based on false theories of global warming.

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

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Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Steven Simpson  
5358 Whipplewood Ave SE  
Salem, OR 97306  
simpss01@gmail.com

**From:** [Mark Overholt](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 9:20:07 AM

---

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Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

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Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Mark Overholt  
261 Hollyview Ave  
Eugene, OR 97404  
m\_ao99@hotmail.com

**From:** [Alena Sheldon](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 9:20:08 AM

---

[You don't often get email from user@votervoice.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

During a most struggling economic crisis please reconsider going forward.. We The middle class are at our breaking point and you will starve and or freeze us to death if you shove this through at this time.

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

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Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Alena Sheldon  
PO Box 411  
Hebo, OR 97122  
[alenacountry@yahoo.com](mailto:alenacountry@yahoo.com)

**From:** [Ronald Thrasher](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 9:20:08 AM

---

[You don't often get email from user@votervoice.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

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Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Ronald Thrasher  
9318 SE Hawthorne Blvd  
Portland, OR 97216  
rwthrasher1@gmail.com

**From:** [Mindy Sheley](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 9:20:08 AM

---

[You don't often get email from user@votervoice.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

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Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Mindy Sheley  
71111 Ruhl Rd  
Burns, OR 97720  
[MindySheley@gmail.com](mailto:MindySheley@gmail.com)

**From:** [Jeremy Ough](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 9:20:08 AM

---

[You don't often get email from user@votervoice.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

These types of attacks creating are more strain on families struggling every day and needs to stop. With fuel and food costs through the roof, you simply can NOT tax or create more restrictions which cost Oregon citizens any more money.

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

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Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Jeremy Ough  
40915 Skyline Dr  
Sweet Home, OR 97386  
Jough70@gmail.com

**From:** [Lonna Davis](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 9:20:09 AM

---

[You don't often get email from user@votervoice.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

We need our natural gas for heat, cooking, and hot water. I can't afford to replace all my appliances!!!

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

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Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Lonna Davis  
1965 Page St  
Medford, OR 97504  
lonnalou@aol.com

**From:** [David Thompson](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 9:20:11 AM

---

[You don't often get email from user@voterveice.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

What are you thinking? Have you been to the grocery store lately? How can you consider putting more financial burden on people? Please table this idea until you are able to offset the costs to EVERY family it will effect.

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

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Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

David Thompson  
335 S Florida St  
Portland, OR 97219  
davidt100@gmail.com

**From:** [Tanya Urbach](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 9:20:11 AM

---

[You don't often get email from user@votervoice.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

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Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Tanya Urbach  
23775 SW Stonehaven St  
Sherwood, OR 97140  
[tanya.durkee@gmail.com](mailto:tanya.durkee@gmail.com)

**From:** [Philip Green](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 9:20:15 AM

---

[You don't often get email from user@votervoice.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Philip Green  
535 SW Point Ave  
Depoe Bay, OR 97341  
ppgmd@icloud.com

**From:** [Aliya Smyth](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Monday, October 9, 2023 9:30:02 AM

---

You don't often get email from [aliya.smyth@gmail.com](mailto:aliya.smyth@gmail.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

However, I was disappointed to hear that the recent rule-making table did not include community input, and also that the results lacked in meeting the plan's original goals of reducing greenhouse gas emissions by 50%, providing meaningful investments to benefit Oregonians, and holding big polluters accountable.

Therefore, I am calling on the DEQ to adapt the rules for CPP implementation to focus on the original goals of:

- 1) Reducing greenhouse gas emissions and other air pollutants, maximizing public health benefits, and minimizing costs for consumers in environmental justice and other communities in Oregon.
- 2) Keeping economic and health benefits of the Community Climate Investment program in Oregon: investments should materially benefit Oregonians at the frontlines of pollution and the climate crisis, rather than paying for cheap offsets in other places.
- 3) Achieving real reduction of emissions by 50%, rather than allowing companies to invest in biomass-derived fuels such as "renewable natural gas" (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
- 4) Holding big polluters accountable to engage in science-based "best available emissions reductions" (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.
- 5) Returning the date for a "new source" of stationary pollution to December 31, 2021.

The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
Aliya Smyth  
7244 SE Insley St  
Portland, OR 97206

**From:** [George Branigan](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 9:30:07 AM

---

[You don't often get email from user@votervoice.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

I am a totally disabled Vietnam veteran. My family and I live on my pension. Gas is used to heat our modest home, and we also use it for cooking. It is AFFORDABLE for us to use, and we never suffered a blackout for our two small gas appliances. For the love of God, please don't stop our use of gas until we have a reliable power source, AND a reliable grid for the delivery of electric. Thank you for your time, and may God Bless,  
-George Branigan

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

George Branigan  
5073 Peace Ln  
Central Point, OR 97502  
lohchief1@gmail.com

**From:** [Scott Waugaman](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 9:30:07 AM

---

[You don't often get email from user@votervoice.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

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Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Scott Waugaman  
760 Meadowbrook Dr  
Central Point, OR 97502  
scottw1007@gmail.com

**From:** [John McNichols](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 9:30:08 AM

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[You don't often get email from user@votervoice.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

It is disgusting to me that you would limit affordable energy for the average Oregonian. When we think about finances we think about heating and running our homes. The whole carbon neutral thing is ridiculous when you are just trying to care for your family. It means less than nothing when we can't afford to heat our home in the winter due to extremely high energy costs.

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

John McNichols  
41720 Fish Hatchery Dr  
Scio, OR 97374  
[johnny.mcnichols@gmail.com](mailto:johnny.mcnichols@gmail.com)

**From:** [Ted Moore](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 9:40:06 AM

---

[You don't often get email from user@votervoice.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

The very unsettled science of carbon based climate change should not drive decisions that will cause untold suffering in Oregon.

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

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Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Ted Moore  
13870 SW 114th Ave  
Portland, OR 97223  
ted.moore@yahoo.com

**From:** [Simon Brown](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 9:40:06 AM

---

[You don't often get email from user@votervoice.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

Build nuclear before de-carbonizing energy.

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Simon Brown  
PO Box 848  
Hillsboro, OR 97123  
ib\_cruzin@yahoo.com

**From:** [Karen Abbott](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 9:40:09 AM

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[You don't often get email from user@votervoice.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Karen Abbott  
3356 Bentley Ave  
Eugene, OR 97405  
kadiesbirds@yahoo.com

**From:** [CHARLES DEISTER](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 9:40:10 AM

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[You don't often get email from cdeister@pilotstrat.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

Dear DEQ,

I respectfully ask that the agency remove the geographic limitation on Renewable Natural Gas (RNG) and preserve all decarbonization options to help keep energy costs down. I appreciate the policy and political objectives the agency is tasked with meeting, but this restriction will only drive-up costs for consumers and create a disincentive to further investments in RNG production and delivery.

The natural gas system is a reliable and safe energy network that helps balance loads and provides energy for thousands of Oregon homeowners and businesses. The natural system is particularly important on days of peak demand, both in the summer and winter, when solar and wind resources are strained, or at times unavailable (such as at night and during weather systems with little or no wind).

Renewable Natural Gas shows great promise in helping decarbonize the energy system while making use of waste methane that would otherwise be vented. And it provides a reliable backbone of system resilience that wind and solar (and batteries) cannot yet provide.

Placing geographic limitations on RNG makes no practical or policy sense given there are no similar requirements for electrons generated from wind and solar.

Thank you for your consideration,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

CHARLES DEISTER  
3187 Pigeon Hollow Rd S

Salem, OR 97302  
cdeister@pilotstrat.com

**From:** [Amy Cookson](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 9:40:11 AM

---

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Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Amy Cookson  
23430 SW Redfern Pl  
Sherwood, OR 97140  
sherwoodians@aol.com

**From:** [James Taylor](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 9:50:12 AM

---

[You don't often get email from user@votervoice.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

Eliminating natural gas heat moves generation of heat from a 90%+ efficient process to a 40% efficient process and you are actually generating more carbon. You are raising the cost of energy, making it less convenient, hurting the environment more. You don't have the knowledge to make these decisions and you are listening to "experts" that are nefarious or incompetent.

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

James Taylor  
16977 NW Trillium St  
Portland, OR 97229  
jamesrtaylorpe@gmail.com

**From:** [Eugene Enos](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 9:50:41 AM

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[You don't often get email from user@votervoice.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

Please continue to provide public energy choice so that all individuals and businesses are allowed to select how to move forward during these difficult and stressful economic times. Oregonians need help, not more hurtful unnecessary energy regulation. Radical activist that promote harmful, bad theory science do not represent all Oregonians .

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Eugene Enos  
1066 Valley Butte Dr  
Eugene, OR 97401  
genos1955@comcast.net

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Monday, October 9, 2023 9:59:47 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
christina mcnair  
695 telegraph dr  
coos bay, OR 97420  
cmcnair2@frontier.com

**From:** [Eric Hobbs](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 10:00:12 AM

---

[You don't often get email from user@votervoice.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Eric Hobbs  
946 SW Veterans Way Ste 102-425  
Redmond, OR 97756  
[Erichobbs79@gmail.com](mailto:Erichobbs79@gmail.com)

**From:** [Sharon Robinson](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 10:00:14 AM

---

[You don't often get email from user@votervoice.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

We upgraded our furnace last year to 96% efficient .I have had electric heat it doesn't heat or keep the house warm as Natural Gas or wood dose .We're to old to mess with wood and can't afford to switch to inefficient electric.We are also on a low income and the prices are high enough.

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

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Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Sharon Robinson  
654 N Old Pacific Hwy  
Myrtle Creek, OR 97457  
sharonarose4u@msn.com

**From:** [Stephen Chapter](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 10:00:16 AM

---

[You don't often get email from user@votervoice.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

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Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Stephen Chapter  
3542 Augusta National Dr S  
Salem, OR 97302  
smcs4.2008@gmail.com

**From:** [Steve Kruger](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 10:10:10 AM

---

[You don't often get email from user@votervoice.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

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Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Steve Kruger  
304 Bullock Rd  
Oakland, OR 97462  
sgrocn2@icloud.com

**From:** [Ron Mauselle](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 10:10:12 AM

---

[You don't often get email from user@votervoice.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

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Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Ron Mauselle  
10940 SW Barnes Rd Apt 150  
Portland, OR 97225  
zodman7@gmail.com

**From:** [Robert Siegmund](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 10:20:06 AM

---

[You don't often get email from user@votervoice.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Robert Siegmund  
2192 Country Haven Dr  
Eugene, OR 97408  
[Bob.Siegmund@gmail.com](mailto:Bob.Siegmund@gmail.com)

**From:** [Janel Hughes](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 10:20:06 AM

---

[You don't often get email from user@votervoice.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

I have been using natural gas to heat my home and cook my food for 25 years. It has been a reliable source of energy all these years. During a power outage I still could cook. Please don't force me to lose a reliable source of energy.

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

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Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Janel Hughes  
210 W 8th St  
The Dalles, OR 97058  
[janelhughes@gmail.com](mailto:janelhughes@gmail.com)

**From:** [Kathleen Krohn](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 10:20:11 AM

---

[You don't often get email from user@votervoice.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Kathleen Krohn  
2106 SW Bridge St  
Grants Pass, OR 97526  
morrison.krohn@gmail.com

**From:** [Linda Rajnus](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 10:30:06 AM

---

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Dear Climate DEQ,

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Thank you for your consideration,

Sincerely,

Linda Rajnus  
PO Box 993  
Keno, OR 97627  
[Imarierajnus@gmail.com](mailto:Imarierajnus@gmail.com)

**From:** [David Roehm](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 10:30:11 AM

---

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Dear Climate DEQ,

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Thank you for your consideration,

Sincerely,

David Roehm  
17305 Brookhurst Dr  
Lake Oswego, OR 97034  
dfroehm@gmail.com

**From:** [Deborah Ferguson](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 10:30:12 AM

---

[You don't often get email from user@votervoice.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

Inflation and gas prices are making it so we had to cut our grocery budget ALREADY! STOP THE INSANITY IN THIS STATE!

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

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Thank you for your consideration,

Sincerely,

Deborah Ferguson  
712 45th St  
Astoria, OR 97103  
[Deblferg58@protonmail.com](mailto:Deblferg58@protonmail.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Monday, October 9, 2023 10:33:53 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Ben Miles  
10783 SW Sunnyhill Ln  
Beaverton, OR 97005  
bmiles@andersen-const.com

**From:** [Glaphre Braswell](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 10:40:08 AM

---

[You don't often get email from user@votervoice.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

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Thank you for your consideration,

Sincerely,

Glaphre Braswell  
880 Youngs Ln  
Roseburg, OR 97471  
[glabraswell@gmail.com](mailto:glabraswell@gmail.com)

**From:** [Earl. F Moore](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 10:40:08 AM

---

[You don't often get email from user@votervoice.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

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Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Earl. F Moore  
13878 Lookingglass Rd  
Winston, OR 97496  
frmoore2@gmail.com

**From:** [LARK SAURMAN](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 10:40:08 AM

---

[You don't often get email from user@votervoice.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

I have enjoyed using natural gas as my preferred choice of cooking and heating for over 45 years. It has not harmed my health nor the health of my 5 children as some liberals try to assert when trying to get rid of natural gas. I appreciate having a choice, and I'm very concerned about having my choice taken away. Please keep my energy costs low and preserve my FREEDOM to use natural gas at an affordable rate.

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

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Thank you for your consideration,

Sincerely,

LARK SAURMAN  
314 W Main St  
Talent, OR 97540  
lsaurman@aol.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Monday, October 9, 2023 10:48:53 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

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Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Ronald Kriens  
14980 se linden ln  
oak grove, OR 97267  
[ron\\_kriens@wycliffe.org](mailto:ron_kriens@wycliffe.org)

**From:** [pdelaquil@gmail.com](mailto:pdelaquil@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking Comment  
**Date:** Monday, October 9, 2023 10:52:39 AM  
**Attachments:** [MCAT Written Coments to EOC.pdf](#)

---

You don't often get email from pdelaquil@gmail.com. [Learn why this is important](#)

DEQ;

Please accept these comments regarding the proposed 2023 CPP Rules Update.

Best regards,

Pat

**From:** [Mike Blaschka](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 11:00:39 AM

---

[You don't often get email from mike@mikelcustoms.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

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Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Mike Blaschka  
2724 Cady Rd  
Jacksonville, OR 97530  
[mike@mikelcustoms.com](mailto:mike@mikelcustoms.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Monday, October 9, 2023 11:05:17 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

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Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Maria Schur  
5734 SE Flavel NO MAIL PLEASE  
Portland, OR 97206  
[mariaschur@hotmail.com](mailto:mariaschur@hotmail.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Monday, October 9, 2023 11:12:22 AM

---

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Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Dave McAllister  
44 Eagle Crest Drive Unit 35  
Lake Oswego, OR 97035  
dmcallister@nunm.edu

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Monday, October 9, 2023 11:12:35 AM

---

Dear Nicole Singh,

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Sincerely,  
James Wright  
PO Box 3824  
Tualatin, OR 97062  
jrwh112@yahoo.com

**From:** [John Livingston](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Please strengthen proposed 2023 climate rules  
**Date:** Monday, October 9, 2023 11:16:15 AM

---

You don't often get email from livingstonjohn@att.net. [Learn why this is important](#)

October 9, 2023

To: Department of Environmental Quality,

Subject: Climate Protection Plan Comments

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As a citizen of 73 years, I know that this rulemaking will have far-reaching consequences for the climate and communities in Oregon and will serve as a model for other states to use.

The words, guidance and direction given in the Climate Protection Program (CPP), if very clear and done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18-month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments and would enable the expansion of new large industrial emitters with the potential to emit huge and unregulated emissions that would adversely affect our climate and air pollution in Oregon.

I therefore strongly urge DEQ to amend the proposed rules by:

<!--[if !supportLists]-->

1. Making sure large industrial emitters are held accountable for their significant climate pollution. As the only existing state regulation on major industrial emitters, it is vital that the CPP works to ensure science-based emissions reductions from existing stationary sources and deter development of new stationary sources in Oregon.
2. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.
3. Restricting biomethane or hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only

biomethane or hydrogen that is injected into a pipeline within Oregon.

4. Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Sincerely, John Livingston 6473 Doral Drive SE, Salem, Oregon 97306

*If you judge people, you will have no time to love them. Mother Teresa*

**From:** [DENNIS Kviz](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 11:20:06 AM

---

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Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

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Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

DENNIS Kviz  
3311 SE Bentley St  
Hillsboro, OR 97123  
dennis.kviz@gmail.com

**From:** [Leo Perry](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 11:20:07 AM

---

[You don't often get email from user@votervoice.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

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Thank you for your consideration,

Sincerely,

Leo Perry  
204 Chimney Rock Ln  
Eugene, OR 97404  
[leojuliep@gmail.com](mailto:leojuliep@gmail.com)

**From:** [Jethro Higgins](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 11:20:17 AM

---

[You don't often get email from user@votervoice.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

It's obvious the powerful don't care about green energy they just care about control and more power. These type of policies are designed specifically to limit the people's ability to grow in economic power and nothing else. All environmental policies are vicious tyrannical power grabs and everyone knows it. If green energy was important the government would build more dams. The government doesn't want green energy to work because then they would lose their unilateral control over everything.

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

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Thank you for your consideration,

Sincerely,

Jethro Higgins  
479 Skelly Rd  
Yoncalla, OR 97499  
[jethrohiggins@gmail.com](mailto:jethrohiggins@gmail.com)

**From:** [Jay Roundtree](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 11:30:08 AM

---

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Thank you for your consideration,

Sincerely,

Jay Roundtree  
10302 S D St  
La Grande, OR 97850  
jround43@gmail.com

**From:** [Erick Lurie](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 11:30:09 AM

---

[You don't often get email from user@votervoice.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

Natural Gas is a clean burning fuel and should be an option to heat my home.

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

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Thank you for your consideration,

Sincerely,

Erick Lurie  
15444 SE Adair Pl  
Clackamas, OR 97015  
e.lurie@comcast.net

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Monday, October 9, 2023 11:34:05 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

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Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Darin Moore  
28735 s.e. highway 212  
boring, OR 97009  
weridemoore@frontier.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Monday, October 9, 2023 11:34:43 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

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Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Roy Moore  
1412 Lewis st  
The Dalles, OR 97058  
[rgmoore111@yahoo.com](mailto:rgmoore111@yahoo.com)

**From:** [B. Johnson](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 11:40:07 AM

---

[You don't often get email from user@votervoice.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

B. Johnson  
1535 W 26th Ave  
Eugene, OR 97405  
[bj7277@aol.com](mailto:bj7277@aol.com)

**From:** [Kendall Horn](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 11:40:07 AM

---

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Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

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Thank you for your consideration,

Sincerely,

Kendall Horn  
218 W Main St  
Sublimity, OR 97385  
khorn745@gmail.com

**From:** [Gina Tiano](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 11:40:08 AM

---

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Dear Climate DEQ,

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Thank you for your consideration,

Sincerely,

Gina Tiano  
1550 SW 16th St  
Redmond, OR 97756  
[gmtiano@gmail.com](mailto:gmtiano@gmail.com)

**From:** [Kevin Charley](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 11:50:06 AM

---

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Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

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Thank you for your consideration,

Sincerely,

Kevin Charley  
31230 Old Santiam Hwy  
Lebanon, OR 97355  
kccelc@yahoo.com

**From:** [Richelle Carkin](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 11:50:09 AM

---

[You don't often get email from user@votervoice.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

Costa of all basic necessities are rising a an alarming rate. I do not support anything that increases cost further. Especially when something like natural gas is already climate friendly.

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

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Thank you for your consideration,

Sincerely,

Richelle Carkin  
28941 SW Costa Cir W  
Wilsonville, OR 97070  
[richellemarie.creative@gmail.com](mailto:richellemarie.creative@gmail.com)

**From:** [Jim Pilling](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 12:10:05 PM

---

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Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

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Thank you for your consideration,

Sincerely,

Jim Pilling  
3220 Crescent Ave Apt Space03  
Eugene, OR 97408  
[jimpill1@comcast.net](mailto:jimpill1@comcast.net)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Monday, October 9, 2023 12:22:00 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
John Meduri  
8712 Wildlife Ln SE  
Salem, OR 97317  
jameduri@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Monday, October 9, 2023 12:22:57 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

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- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Carol Reese  
6442 SE 131st Avenue  
Portland , OR 97236  
reesec243@gmail.com

**From:** [Dan Johnson](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 12:30:07 PM

---

[You don't often get email from user@votervoice.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

Gas is an efficient, cost effective resource

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

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Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Dan Johnson  
123 Camellia Dr  
Lebanon, OR 97355  
danluvsdeb@comcast.net

**From:** [Nancy Neumann](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 12:40:09 PM

---

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Dear Climate DEQ,

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Thank you for your consideration,

Sincerely,

Nancy Neumann  
1244 SE Seaport Cir  
Corvallis, OR 97333  
nrneumann@yahoo.com

**From:** [Shawn Graham](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Climate Program - Public Comment  
**Date:** Monday, October 9, 2023 12:48:58 PM

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You don't often get email from shawn@peak.org. [Learn why this is important](#)

I'll keep this simple. Please don't let your reach exceed my grasp. Meaning, that good intentions are not enough, you must pursue good policy. Good policy in this case means a reasonable and affordable roll-out that doesn't bring with it a lot of unintended negative consequences.

A good example of bad policy masquerading as a good intention, is that fool Biden's mandate to replace 50% of all carbon fuel vehicles with EV technology by 2030. That's not even theoretically possible, it's not even a semi-reasonable target. It's pure politics.

The world is not about to burst into flames if we aren't 100% zero emissions in 10 years. Take your time, don't give in to naïve and uninformed hysteria.

Thank you.

Shawn Graham – Corvallis, OR.

Sent from [Mail](#) for Windows

**From:** [Robert DeKoning](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 12:50:05 PM

---

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Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

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Thank you for your consideration,

Sincerely,

Robert DeKoning  
2142 NW Wheatfield Way  
Portland, OR 97229  
[rdekoning12@gmail.com](mailto:rdekoning12@gmail.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Monday, October 9, 2023 12:55:29 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
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Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change. Inflation is bad enough right now. Stop oppressing the lower and middle classes.

Sincerely,  
Jeffrey CARLSON  
12154 SW WESTBURY Ter  
PORTLAND, OR 97223  
JEFE.CARLSON@GMAIL.COM

**From:** [Mark Erdmann](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 1:00:08 PM

---

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Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

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Thank you for your consideration,

Sincerely,

Mark Erdmann  
21101 NW Cannes Dr  
Portland, OR 97229  
erdmann1351@comcast.net

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Monday, October 9, 2023 1:00:11 PM

---

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Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Carol Wilson  
11559 SW Preakness  
Wilsonville, OR 97070  
cods@frontier.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Monday, October 9, 2023 1:01:21 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

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Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Jeffrey White  
15045 SW 150th Court  
Beaverton, OR 97007  
[jeff.l.white@me.com](mailto:jeff.l.white@me.com)

**From:** [Randall Roth](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 1:10:11 PM

---

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Dear Climate DEQ,

Let's keep the truth about this subject, front and center. The models used for climate change info are programmed by someone. Let's deal with the issues we really and truthfully need to deal with.

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

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Thank you for your consideration,

Sincerely,

Randall Roth  
1992 Barnes Ave SE  
Salem, OR 97306  
whtevrtru10@gmail.com

**From:** [Donald Schroeder](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 1:20:08 PM

---

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Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

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Thank you for your consideration,

Sincerely,

Donald Schroeder  
1276 Goodpasture Island Rd Unit A  
Eugene, OR 97401  
donschroedermd@gmail.com

**From:** [Christopher Patterson](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 1:20:08 PM

---

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Thank you for your consideration,

Sincerely,

Christopher Patterson  
2493 Pioneer Rd  
Talent, OR 97540  
cpatterson1965@gmail.com

**From:** [Diane Meisenhelter](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Testimony on Climate 2023 rulings  
**Date:** Monday, October 9, 2023 1:26:01 PM

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You don't often get email from [meissun@hotmail.com](mailto:meissun@hotmail.com). [Learn why this is important](#)

I was disappointed to see the unbalanced roster of folks on the Climate 2023 Rulemaking Committee, heavily stacked with industry and few environmental representatives. Given the make-up of the group it is not surprising that the rulings continue to rely on industry guestimate self-reporting through an industry-stacked methodology. The environmental coalition I work with in Portland OR, primarily on the CEI HUB, is very disturbed that DEQ is still utilizing old AP-42 standards written by the oil industry with self-reporting based on the BAER survey. This methodology has been shown to vastly underestimate the amount of emissions by up to 59% and for the Climate Protection Plan to realistically address emission reductions is fully insufficient. Other states utilize preferred newer standards, including EPA methods 204 and 325 to replace company guestimates with actual air quality monitoring DATA, emissions inventories, and health assessments. Oregon should move away from the antiquated BAER system and problematic modeling the rulings are based on.

We are also concerned that DEQ's current proposed Climate 2023 rules would effectively undermine the CPP— a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process. DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

We strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon. The CPP already provides significant flexibility/cost constraints for gas utilities to comply. Allowing further flexibility—e.g. use of RTCs—will hinder the transition to non-emitting alternatives and fail to reduce climate/air pollution or deliver health/consumer benefits for environmental justice communities in Oregon.

These projects deliver no direct benefits to Oregonians, while CCIs will provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate

Investment (CCI) program.

The CCI program was developed and informed by many months of engagement with environmental justice communities in Oregon, with the goal of supporting investments that maximize public health, jobs, and cost-saving benefits for these and other communities historically disenfranchised and disproportionately impacted by economic disinvestment, health challenges, and environmental harms.

2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon. Unfortunately, since the adoption of the final CPP rules in 2021, increasing emissions from Oregon's industrial sector has become a reality when we should be holding polluters responsible for decreasing emissions.

3) Maintaining protective restrictions on methane and biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from anthropogenic carbon sources does not comply with the CPP. Similarly, why exempt airplane fuels and biogenic fuels from certain emission reductions and reporting standards?

4) Including export and transport facilities in emission reduction and reporting standards. Export facilities should have to list their final destinations. While they may utilize devices to reduce emissions during pumping phases, the open venting of railroad cars to reduce sparking must also be taken under consideration as should potential leakage during storage, transportation, and transfers. Any substantive change of site use should require a new ACDP or Title V permitting instead of being allowed to operate under old permits. Export facilities add to overall global emissions which affect us all in terms of climate chaos.

5) Not eliminating the phrase "additional documentation must be available for verification upon request" from a number of the sections. Instead, under 340-15042 biofuels and other so-called renewable fuels should not only be reporting on feedstocks and production methodologies, but also on the fuels used for hydrogenation, esterification or other processing to adequately access the true Carbon intensity numbers. Reporting should also include the land change values necessary to determine what other crops the land could have produced for human consumption as well as associated transportation and fertilizer emissions, and the like for a full picture. Carbon intensity modeling is problematic in numerous ways which is why actual monitoring data and health assessments are preferable.

Thank-you for your time and consideration. It is imperative for all of our health and safety, given the short timeframe global scientists say we have to reduce emissions in half by 2025, that these rulings be as strong as possible in line with the goals of the state Climate Protection Plan instead of fostering business-as-usual or false solutions.

Diana Meisenhelter, XR Action Team  
inner NE Portland resident  
Cell: 503-349-1460

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Monday, October 9, 2023 1:33:23 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

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Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Mitch Hutchinson  
2262 Wisconsin  
Eugene , OR 97402  
[mitch.hutch@aol.com](mailto:mitch.hutch@aol.com)

**From:** [Kathleen Adamson](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 1:40:10 PM

---

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Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Kathleen Adamson  
720 NW Fenton St  
McMinnville, OR 97128  
[grammyadamson@gmail.com](mailto:grammyadamson@gmail.com)

**From:** [Civicklick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Monday, October 9, 2023 1:52:03 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down for all and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Theo Howe  
33824 Southeast Rose Lane  
Scappoose, OR 97056  
theoeh@comcast.net

**From:** [Clint Talbert](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rules to limit fossil fuel emissions - PLEASE MAKE THEM!  
**Date:** Monday, October 9, 2023 1:52:21 PM

---

You don't often get email from cmtalbert@gmail.com. [Learn why this is important](#)

Hello,

I saw the rules that DEQ is making to limit fossil fuel usage and to encourage actual renewable energy (which does NOT include natural gas). Please proceed with all haste. We need to stop using fossil fuels everywhere in order to have a livable planet for our children.

You should also know that I only found out about this because NW Natural (we have a natural gas stove that we have not yet been able to replace) sent us a [piece of greenwashing inviting us to urge you to weaken the rules](#). DO NOT WEAKEN the rules. Make them stronger. We cannot afford to continue to allow companies like NW Natural to keep doing what they've been doing for the past decades. That's how we got in this mess.

I'll stand with you if you take strong action on climate change.

Thank you,

Clint Talbert  
West Linn, OR.

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Monday, October 9, 2023 1:54:12 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Phillip Stambaugh  
900 Fairway Rd  
Lake Oswego, OR 97034  
[philstambaugh@comcast.net](mailto:philstambaugh@comcast.net)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Monday, October 9, 2023 1:56:44 PM

---

Dear Nicole Singh,

As a Portland resident, on a fixed small income, I'm worried about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on natural gas, because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
David Ashton  
5132 SE Flavel Drive  
Portland, OR 97206  
davidashtonco@outlook.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Monday, October 9, 2023 2:11:48 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Keith Moes  
623 Piper St  
Independence, OR 97351  
kcmoes01@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Monday, October 9, 2023 2:12:11 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
David Beatty  
300 McLaughlin Dr  
Woodburn, OR 97071  
davidbbeatty@live.com

**From:** [Randy Walker](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 2:30:08 PM

---

[You don't often get email from user@votervoice.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Randy Walker  
3510 Mountain Quail Ln  
Eugene, OR 97405  
rswalkerfam@gmail.com

**From:** [Todd Miller](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 2:40:14 PM

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Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Todd Miller  
2354 NE 54th Ave  
Portland, OR 97213  
delosfox@hotmail.com

**From:** [Charles Oppenheimer](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 2:50:08 PM

---

[You don't often get email from user@votervoice.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Charles Oppenheimer  
845 9th St  
Lake Oswego, OR 97034  
[coppenheimer@gmail.com](mailto:coppenheimer@gmail.com)

**From:** [Ross Souza](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 2:50:08 PM

---

[You don't often get email from user@votervoice.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Ross Souza  
2810 Arrowhead St  
Eugene, OR 97404  
rossfife@aol.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Monday, October 9, 2023 2:53:19 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

The generic response above expresses my sense of how we should be approaching this supposed climate crisis. I would simply add that none of us are as smart as we think we are and you folks writing these new rules are included in that. It would be wrong to squeeze out existing, plentiful, clean, and affordable sources of energy like natural gas in the name of climate change. I'm not saying we should never move to new forms of energy, but believe strongly that those new sources should only squeeze out the old when they are demonstrated to be cheaper, more plentiful, cleaner, and more efficient. Allowing the market to determine these things is far and away the better choice. Commanding things and disregarding the market raises everyone's costs and hurts those who can least afford it the most. Thank you for your time.

Sincerely,  
Steven Ramsey  
16155 Trail Drive  
Oregon City, OR 97045  
[jffistuzie@comcast.net](mailto:jffistuzie@comcast.net)

**From:** [Patrick Sheehan](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** comment  
**Date:** Monday, October 9, 2023 2:54:55 PM

---

You don't often get email from patrick@patricksheehan.com. [Learn why this is important](#)

October 9, 2023

Oregon Department of Environmental Quality  
Attn: Elizabeth Elbel and Nicole Singh  
700 NE Multnomah St., Room 600  
Portland, OR 97232-4100

RE: 2023 Climate Rulemaking Comments from Concerned Workers and Business Leaders

I appreciate the opportunity to provide public comments on DEQ's proposed changes to the Greenhouse Gas Reporting Program (Division 215) and the Climate Protection Program (Division 271).

I am concerned about cost impacts to our state's workforce and families. I urge DEQ to help keep costs down by using the most effective and efficient ways to reduce emissions.

- I support decarbonized fuels – like renewable natural gas – as tools for reducing emissions, **including from sources outside of Oregon.**
- Decarbonized fuels provide tangible greenhouse gas savings by displacing the use of more carbon intensive fuels, regardless of the end use location or a pipeline connection to Oregon. Reducing emissions anywhere, within Oregon or otherwise, creates a climate benefit everywhere, including for Oregonians.
- Imposing arbitrary geographic limits on where environmental attributes can be procured harms rather than helps Oregonians. This would be akin to excluding wind and solar resources from outside of Oregon – which would prevent us from meeting our clean electricity goals.
- Limitations will increase compliance costs under the Climate Protection Program. As a business operating in Oregon, we are concerned with efficiency and cost. It is important that real carbon reductions are achieved by the Climate Protection Program in the most cost-effective manner.
- Proven and auditable carbon accounting methods are important. The standard book and claim accounting methodology for decarbonized fuel use from across North America provides a mechanism for proper greenhouse gas accounting under the Greenhouse Gas Reporting Rule while controlling costs.

Please control for costs.

Increasing decarbonized fuel supply decreases costs, which is why we urge DEQ to be consistent with other carbon markets and programs by not arbitrarily including geographic limitation on biomethane and renewable natural gas in the Climate Protection Program and Greenhouse Gas Reporting Rule.

Sincerely,

Patrick Sheehan

---

Patrick Sheehan  
Oregon Real Estate Broker  
Better Homes & Gardens Real Estate

Patrick@PatrickSheehan.com  
www.PatrickSheehan.com  
(503) 734-0337 Mobile  
(Global clients may reach me via WhatsApp at that number)

12550 SE 93rd Ave., #200  
Clackamas, OR 97015

Oregon Broker License: 200506399  
NRDS ID# 709013636

**From:** [Patti Tripp \(pattitripp7@gmail.com\) Sent You a Personal Message](mailto:pattitripp7@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Monday, October 9, 2023 2:56:45 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

The earth belongs to everyone, not just the rich!!!

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Patti Tripp  
3598 Peck Ave SE  
Salem, OR 97303  
pattitripp7@gmail.com  
(503) 409-7849

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Kent Zimmerman](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 3:10:06 PM

---

[You don't often get email from kz@accesselectric.biz. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Kent Zimmerman  
7095 SW 68th Ave  
Portland, OR 97223  
kz@accesselectric.biz

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Monday, October 9, 2023 3:17:46 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Marie Lathrop  
309 SE 76th Ave  
Portland, OR 97215  
yorkiesnme@hotmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Monday, October 9, 2023 3:43:20 PM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs of natural gas, simply because it contains a minuscule amount of carbon. When burned the carbon atom doesn't change, only the complexity of the molecule that it is a part of. Photosynthesis will change it again anyway, so what's the big deal.

Would you please provide the peer reviewed evidence that shows carbon is responsible for supposed "climate change." Also, considering the Earth has been in an Ice Age for thousands of years, how does anyone know what it will be like when it is over. It might be nicer.

Please consider CO<sub>2</sub> as a natural compound and not a pollutant. It forms naturally and is necessary for plants to grow.

The only thing that will be accomplished by further regulation and increased cost of natural gas will be more cold people, and it will be your fault.

Sincerely,  
Michael Mcclenahen  
1874 SW 13th Ct  
Gresham, OR 97080  
[Michael.mcclenahen@gmail.com](mailto:Michael.mcclenahen@gmail.com)

**From:** [George Painter](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 4:10:06 PM

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[You don't often get email from [gpainter@threerocks.com](mailto:gpainter@threerocks.com). Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

George Painter  
4180 Sunbeam Ct SE  
Salem, OR 97302  
[gpainter@threerocks.com](mailto:gpainter@threerocks.com)

**From:** [Donald Charles Meyer MEYER](mailto:don@pikesnw.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 4:11:53 PM

---

[You don't often get email from don@pikesnw.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

No good will come from removing the right to have a choice of utilities!!

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Donald Charles Meyer MEYER  
1176 Charlene St S  
Salem, OR 97306  
don@pikesnw.com

**From:** [Veronica Poklemba](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Monday, October 9, 2023 4:11:54 PM

---

You don't often get email from ronnie717@comcast.net. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

However, I was disappointed to hear that the recent rule-making table did not include community input, and also that the results lacked in meeting the plan's original goals of reducing greenhouse gas emissions by 50%, providing meaningful investments to benefit Oregonians, and holding big polluters accountable.

Therefore, I am calling on the DEQ to adapt the rules for CPP implementation to focus on the original goals of:

- 1) Reducing greenhouse gas emissions and other air pollutants, maximizing public health benefits, and minimizing costs for consumers in environmental justice and other communities in Oregon.
- 2) Keeping economic and health benefits of the Community Climate Investment program in Oregon: investments should materially benefit Oregonians at the frontlines of pollution and the climate crisis, rather than paying for cheap offsets in other places.
- 3) Achieving real reduction of emissions by 50%, rather than allowing companies to invest in biomass-derived fuels such as "renewable natural gas" (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
- 4) Holding big polluters accountable to engage in science-based "best available emissions reductions" (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.
- 5) Returning the date for a "new source" of stationary pollution to December 31, 2021.

The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
Veronica Poklemba  
3575 SE Kelly St.  
Portland, OR 97202

**From:** [Pamela Brandon](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 4:20:05 PM

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[You don't often get email from user@votervoice.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

With the increasing unrest in the world do you really believe it is time to increase energy costs.. People are drowning in increase expenses for gas for cars and now you want to go after natural gas, that is an economical was to heat homes. We have an abundance of natural gas it is clean and efficient. We are all worried about climate change but timing is everything and this is not the time to cause more pain to our wallets.

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Pamela Brandon  
70057 Hinkle Butte Dr  
Sisters, OR 97759  
pambbbb@mac.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Monday, October 9, 2023 4:26:45 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
jeff thomas  
3405 NE 40th Ave  
portland, OR 97212  
weiser86@gmail.com

**From:** [Allan Huffaker](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Climate Protection Program Comments  
**Date:** Monday, October 9, 2023 4:33:20 PM

---

You don't often get email from allan\_huffaker@hotmail.com. [Learn why this is important](#)

Its very important that we find more sources of clean burning natural gas.  
America does NOT need more regulation, we need more innovation.  
Natural Gas, along with other sources of clean energy like nuclear will drive our economy forward.  
Small Scale Modular Reactors can produce large amounts of hydrogen to power transportation and industry.  
There needs to be fewer regulations, not more.  
The time for American Energy Independence is now!

Allan Huffaker

**From:** [Martha or Peter Dragovich](#)  
**To:** [2023 Climate - DEQ](#)  
**Subject:** Please strengthen proposed 2023 climate rulesDepartment of Environmental Quality.  
**Date:** Monday, October 9, 2023 4:56:56 PM

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Thank you for the opportunity to provide comment on DEQ's 2023 climate rule making. As DEQ knows well, this rule making will have far-reaching consequences for the climate and communities in Oregon.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP- a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18 month rule making and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

I strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane or hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Sincerely,

Martha Dragovich,  
Eugene

**From:** [Michael Gillette](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 5:00:12 PM

---

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Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Michael Gillette  
10455 SW Cornett Loop  
Powell Butte, OR 97753  
motorcycmike@gmail.com

**From:** [Shana Wright](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 5:10:09 PM

---

[You don't often get email from user@votervoice.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Shana Wright  
2240 NW Larchleaf Ln  
Redmond, OR 97756  
shanaak@msn.com

**From:** [Randy Wright](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 5:20:10 PM

---

[You don't often get email from user@votervoice.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Randy Wright  
61295 Mountain Breezes Ct  
Bend, OR 97702  
[randywrightak@yahoo.com](mailto:randywrightak@yahoo.com)

**From:** [Rebecca Orf](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make the emissions reduction rules as strong as possible  
**Date:** Monday, October 9, 2023 5:23:46 PM

---

You don't often get email from orf.rebecca@gmail.com. [Learn why this is important](#)

I am an Oregonian who supports strong state action to address the climate crisis.

The Best Available Emissions Reduction rules should not put polluting industries on a downward trajectory of emissions. Gas utilities should be prohibited from importing unlimited Renewable Natural Gas from out of state to offset emissions or using hydrogen unless the hydrogen is produced with electricity generated by renewable fuels.

For the sake of all of us—and our children, grandchildren, and future generations--DEQ must adopt rules consistent with the CPP as approved by the Environmental Quality Commission. I urge you to make the rules as rigorous as possible to assure a reduction in carbon emissions.

Sincerely,

Becky Orf, Ashland Or 97520

**From:** [Philip Marvin](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 5:30:17 PM

---

[You don't often get email from plm@m3cre.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Philip Marvin  
PO Box 2055  
Eugene, OR 97402  
plm@m3cre.com

**From:** [Patrick Duhachek](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 5:40:10 PM

---

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Dear Climate DEQ,

I recently converted my home from all electric heating to a gas furnace. My electric bill was reduced by a third and my gas bill barely increased. It is not efficient to heat homes with electricity.

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Patrick Duhachek  
89736 Seales Rd  
Warrenton, OR 97146  
[pduhachek@gmail.com](mailto:pduhachek@gmail.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Monday, October 9, 2023 6:05:13 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
ROGER PLANT  
514 Honeysuckle Lane  
Eugene, OR 97401  
rogerplant8@yahoo.com

**From:** [Deborah Medley](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 6:50:09 PM

---

[You don't often get email from user@votervoice.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Deborah Medley  
4867 Towhee Ct S  
Salem, OR 97302  
debmed09@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Monday, October 9, 2023 6:50:59 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
ALEX MILLER  
7317 CANEBERRY CT NE  
KEIZER, OR 97303  
ALEX@AMCPAPC.COM

**From:** [Linda Stork \(lindastork01@yahoo.com\) Sent You a Personal Message](mailto:lindastork01@yahoo.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Monday, October 9, 2023 7:56:33 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Linda Stork  
P.O. BOX 25336  
EUGENE, OR 97402  
lindastork01@yahoo.com  
(541) 998-3251

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Nicole Reed](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 8:10:15 PM

---

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Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Nicole Reed  
2109 2nd St  
La Grande, OR 97850  
[reedanicole@gmail.com](mailto:reedanicole@gmail.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Monday, October 9, 2023 8:48:11 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Samuel Busskohl  
82631 Barbre Rd.  
Dexter, OR 97431  
stbusskohl@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Monday, October 9, 2023 9:37:17 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Cheryl Rogers  
640 Nottingham Ave  
Eugene, OR 97404  
roges5@msn.com

**From:** [Shawn Massey](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 9:50:13 PM

---

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Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Shawn Massey  
29501 Bridge Rd  
Hermiston, OR 97838  
[stylingarena@eotnet.net](mailto:stylingarena@eotnet.net)

**From:** [Sheryl TIBBETS](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Monday, October 9, 2023 10:00:26 PM

---

[You don't often get email from user@votervoice.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

Heat my house, dry clothes, heat our water with natural gas.

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Sheryl TIBBETS  
1362 Orchard Home Dr  
Medford, OR 97501  
stibbets5@gmail.com

**From:** [Molly Foerster](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** make CPP a rigorous program committed to reducing carbon emissions.  
**Date:** Tuesday, October 10, 2023 7:12:01 AM

---

[You don't often get email from foerstermolly@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

I'm an Oregonian from birth and I want rigorous climate action in my state. Take climate change seriously.

Molly Foerster  
Bend, OR

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 8:17:17 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
David Brezinski  
1915 Palisades Terrace Drive  
Lake Oswego, OR 97034  
dbrezinski@comcast.net

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 8:30:04 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Chris Kline  
2115 Greenview Street, Eugene, OR, USA  
Eugene, OR 97401  
kmokline@msn.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 8:32:51 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Chris Miller  
1710 NW Independence HWY  
Albany, OR 97321  
tech@fuelinjectionent.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: stop the hysteria.  
**Date:** Tuesday, October 10, 2023 8:35:29 AM

---

Dear Nicole Singh,

Global Warming I mean Climate Change I mean GLOBAL BOILING OH NO WE'RE ALL GONNA DIE is another scam to gain power and money, just as covid was. CO2 is plant food and necessary for life on this planet. Stop the hysteria. Stop the taxes. Stop the lies.

Sincerely,  
sam wolanyk  
5235 NE 42nd Ave  
Portland, OR 97218  
samwolanyk@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Tuesday, October 10, 2023 8:38:23 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Kris Kelly  
2025 NW Sulphur Springs Road  
Corvallis, OR 97330  
kelly52119@gmail.com

**From:** [Gary Beachman](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** DEQ comments  
**Date:** Tuesday, October 10, 2023 8:41:09 AM

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You don't often get email from gbeachman@gmail.com. [Learn why this is important](#)

Make certain you guys expand this renewable idea OUTSIDE the borders of Oregon. The wind guys do it so make certain this thought gets into the new plans for the natural gas folks too.

Gary Beachman  
Retired

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Tuesday, October 10, 2023 8:42:27 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Gary Buckles  
16790 NW Firestone Ct  
Beaverton, OR 97006  
gpbuck@comcast.net

**From:** [Jill Hettinga](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** No!  
**Date:** Tuesday, October 10, 2023 8:42:49 AM

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You don't often get email from pjhettinga@comcast.net. [Learn why this is important](#)

I do not support DEQ's over reaching plan in the name of climate change. Stop! Just Stop!

This will not help the environment but it will cripple business create more financial hardship on those already vulnerable families.

Please listen to real science not political messaging and fear mongering. The road to hell is paved with good intentions.

~Jillian

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 8:44:09 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
David Walker  
14695 SW 92nd Ave  
Tigard, OR 97224  
Davidrwalker@live.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Tuesday, October 10, 2023 8:44:10 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
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Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Bruce Wood  
544 Joseph St SE  
Salem, OR 97302  
navyret89@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 8:46:36 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Diane Gravelle  
816 SE River Forest Court  
Oak Grove , OR 97267  
Stromberg503@comcast.net

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 8:46:36 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Ronald Hylton  
773 SE 33rd Ave  
Hillsboro, OR 97123  
[ronald.w.hylton@prodigy.net](mailto:ronald.w.hylton@prodigy.net)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 8:49:07 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Dean Vrooman  
8720 SW Yakima Ct  
Tualatin, OR 97062  
hawkradio@aol.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Tuesday, October 10, 2023 8:49:47 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Jerry Holmes  
1530 N.E. Jackson School Rd  
Hillsboro, OR 97124  
jeho54@yahoo.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Tuesday, October 10, 2023 9:00:57 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Rebecca Tweed  
7844 SW Alder St  
Tigard, OR 97224  
[rebecca@tweedstrategies.com](mailto:rebecca@tweedstrategies.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 9:03:44 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Martin Brubaker  
935 W. Vine  
Lebanon, OR 97355  
littlebru@comcast.net

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 9:04:08 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Roger Payne  
19337 Auburn Dr.  
Oregon City, OR 97045  
[paparoger3282@gmail.com](mailto:paparoger3282@gmail.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 9:06:15 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
William King  
15019 SW Summerview Drive, Tigard, OR  
Tigard, OR 97224  
wcking1970@comcast.net

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 9:06:55 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

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Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Rebecca Tweed  
7844 SW Alder St  
Tigard, OR 97224  
[rebecca@tweedstrategies.com](mailto:rebecca@tweedstrategies.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Tuesday, October 10, 2023 9:07:36 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

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Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Brittany Olsen  
810 E 9th St Apt A3  
Newberg, OR 97132  
brytning@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 9:09:31 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

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Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Stephen Kassis  
990 S 2nd St  
Lebanon, OR 97355  
[sk@fillingstation.com](mailto:sk@fillingstation.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 9:11:48 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

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Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Rocky Lamanna  
1252 Debrick Road  
Eugene, OR 97401  
[arlamanna@comcast.net](mailto:arlamanna@comcast.net)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Tuesday, October 10, 2023 9:12:43 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

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Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Nancy Bryant  
2422 NW Molly Court  
Corvallis, OR 97330  
[nancybryant47@gmail.com](mailto:nancybryant47@gmail.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 9:16:02 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

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Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Erika Glancy  
11335 Sw Ambiance Pl  
Tigard, OR 97223  
Erika.glancy@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Tuesday, October 10, 2023 9:16:19 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

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Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Gordon Quickstad  
17755 NW Fall Ct  
Beaverton, OR 97006  
ceehtoo@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 9:17:55 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
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Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Chris Coleman  
4275 Alpenglow Dr  
Hood River, OR 97031  
Colemanxchris@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Tuesday, October 10, 2023 9:21:11 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

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Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

I know this is a complicated project but I urge you to consider these points in making your final decision.

Sincerely,  
Susan Crowston-Egly  
1407 Settlers Loop  
Forest Grove, OR 97116  
[susan.m.crowston@gmail.com](mailto:susan.m.crowston@gmail.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 9:22:47 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change. We need to continue the use of natural gas as one source of energy while utilizing other "greener" resources. It is never good to use one type of energy source to the exclusion of another. Keep the costs down please.

Sincerely,  
Carla Morreale  
592 7th St  
Lake Oswego, OR 97034  
[carlamor22@gmail.com](mailto:carlamor22@gmail.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 9:24:06 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
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Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Herman Fleishman  
PO Box 19633  
Portland, OR 97280  
[herman@fish-northwest.com](mailto:herman@fish-northwest.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 9:27:54 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
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Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Ralph Tuttle  
18982 Bryant Rd  
Lake Oswego, OR 97034  
[rtuttle357@comcast.net](mailto:rtuttle357@comcast.net)

**From:** [Civicklick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 9:29:36 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

I also seems to me that basing this program on flawed and junk science is exceedingly foolish.

Sincerely,  
Bill McLagan  
5697 Umpqua LN NE  
Albany, OR 97321  
wdmac50@proton.me

**From:** [Craig](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Carbon reduction plan  
**Date:** Tuesday, October 10, 2023 9:30:40 AM

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[You don't often get email from [craig.zarling@comcast.net](mailto:craig.zarling@comcast.net). Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear DEQ,

Thanks for allowing me to comment on the climate action plan; this is a crucial subject for all of us and I hope to help get it right.

My comment is to include region wide renewable resources rather than more geographically limited areas in planning and calculating progress. In our Western region the power needs and power generation vary widely within timeframes, and power transfer and storage between areas is likely to be part of a less wasteful power plan.

Craig Zarling

Portland

Sent from my iPad

**From:** [Abby Dalke](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, October 10, 2023 9:30:40 AM

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You don't often get email from [abbydalke12@gmail.com](mailto:abbydalke12@gmail.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

However, I was disappointed to hear that the recent rule-making table did not include community input, and also that the results lacked in meeting the plan's original goals of reducing greenhouse gas emissions by 50%, providing meaningful investments to benefit Oregonians, and holding big polluters accountable.

Therefore, I am calling on the DEQ to adapt the rules for CPP implementation to focus on the original goals of:

- 1) Reducing greenhouse gas emissions and other air pollutants, maximizing public health benefits, and minimizing costs for consumers in environmental justice and other communities in Oregon.
- 2) Keeping economic and health benefits of the Community Climate Investment program in Oregon: investments should materially benefit Oregonians at the frontlines of pollution and the climate crisis, rather than paying for cheap offsets in other places.
- 3) Achieving real reduction of emissions by 50%, rather than allowing companies to invest in biomass-derived fuels such as "renewable natural gas" (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
- 4) Holding big polluters accountable to engage in science-based "best available emissions reductions" (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.
- 5) Returning the date for a "new source" of stationary pollution to December 31, 2021.

The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
Abby Dalke  
4005 NE Rodney Ave  
Portland, OR 97212

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Tuesday, October 10, 2023 9:31:50 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Roger Arnell  
1570 SE Paloma Ct.  
GRESHAM, OR 97080  
[roger@arnellfam.com](mailto:roger@arnellfam.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Tuesday, October 10, 2023 9:33:31 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Michele Jenkins  
561 Arthur St  
Woodburn, OR 97071  
[chelej13@gmail.com](mailto:chelej13@gmail.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 9:33:37 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Eric Buck  
655 NW Spyglass Ct  
Albany, OR 97321  
buckbiz@yahoo.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 9:35:48 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Jane Buck  
655 NW Spyglass Ct  
Albany, OR 97321  
[onlinebizsupport@gmail.com](mailto:onlinebizsupport@gmail.com)

**From:** [Lila Brightbill](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** DEQ Rule Change on Renewables  
**Date:** Tuesday, October 10, 2023 9:38:09 AM

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You don't often get email from [lmbrightbill@gmail.com](mailto:lmbrightbill@gmail.com). [Learn why this is important](#)

Please tell the Governor to ignore the whining of Big Business and proceed in all haste with all initiatives to save our planet. The concerns about costs may be immediate, but they ignore the long term costs to humans, plants, animals, and insects that inhabit this planet.

If CEOs are so concerned about costs being passed on to consumers, tell them to turn over their obscene paychecks to defray some of those costs. They are enriching themselves while passing the all more permanent costs to life on Earth onto their consumers.

And that's not called capitalism. It's called selfish greed masquerading as concern for the consumer.

Lila Brightbill  
6230 SE 32nd Ave.  
Portland, OR 97202  
971.221.3125  
[lila5402842@gmail.com](mailto:lila5402842@gmail.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 9:39:18 AM

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Dear Nicole Singh,

The state of Oregon government agencies should not be taking actions which will increase the cost of heating our homes, hot water, and cooking. Energy market costs to the consumer should not be manipulated by the state causing increases in the citizens energy costs. This is wrong, and I oppose these actions in all ways possible. Today the government is treating us like wealthy folks who can just handle never ending increases in the cost of living.

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.

- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Brian Hunter  
194 NE Hayes St.  
Hillsboro, OR 97124  
[hunter.brian@hotmail.com](mailto:hunter.brian@hotmail.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Tuesday, October 10, 2023 9:42:28 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Eric Olson  
80582 Polo Ridge Rd  
Warrenton, OR 97146  
deadreckon1039@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Tuesday, October 10, 2023 9:43:37 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Holly Van Fleet  
6025 SE 19th ave  
Portland, OR 97202  
quatzi@yahoo.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 9:45:25 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Jill Hunter  
5515 N. Pacific Hwy 99 E  
Rickreall, OR 97371  
Jillhunter5515@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 9:49:44 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Gary Derickson  
1781 Cole Road S  
Salem, OR 97306  
gderickson@corban.edu

**From:** [Daniel Whitney](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Tuesday, October 10, 2023 9:50:12 AM

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Dear Climate DEQ,

Forcing someone who's on a fixed income to spend thousands of dollars to convert to electric and then pay higher energy cost is criminal, unwise and uncaring.

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Daniel Whitney  
711 NE 68th Ave  
Portland, OR 97213  
[Daniel\\_Whitney@outlook.com](mailto:Daniel_Whitney@outlook.com)

**From:** [Jan Lindsay](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Tuesday, October 10, 2023 9:50:14 AM

---

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Jan Lindsay  
6106 SW 67th Pl  
Portland, OR 97223  
[jan.lindsay@comcast.net](mailto:jan.lindsay@comcast.net)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Tuesday, October 10, 2023 9:53:14 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Rick Plummer  
21030 S Wilson Ct  
Oregon City, OR 97045  
bruiser@bctonline.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Tuesday, October 10, 2023 9:53:38 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Nicole Griffin  
3826 Colony Oaks Dr  
Eugene, OR 97405  
[pagansmail-politics@yahoo.com](mailto:pagansmail-politics@yahoo.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Tuesday, October 10, 2023 9:53:44 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
RALPH CUPPOLETTI  
31380 SW Parkway  
WILSONVILLE, OR 97070  
otsralph@aol.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 9:54:47 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
GEORGE JESSIE  
721 ASPEN ST  
SPRINGFIELD, OR 97477  
GJESSIE@COMCAST.NET

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 9:59:24 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program.

Climate Change is a HOAX that we cannot afford to play with.

I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down by dropping any ideas or legislation involving the lie of fossil fuel and that "fossil fuel" is bad.

Sincerely,  
Scott Zentz  
1331 SE Academy St  
Dallas, OR 97338  
zentz01@aol.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 10:06:14 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change. Our Oregonians are struggling mightily with affordability, and programs that raise expenses and fees all get passed down the consumer. Please keep affordability at the forefront of any conversations.

Sincerely,  
Tyler Stone  
19638 Suncrest Dr  
West Linn, OR 97068  
tstone706@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 10:08:01 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Delores Cooper  
7536 SE 141st Ave  
Portland, OR 97236  
del26@hotmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 10:10:57 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Natividad B. Madsen  
1156 Valley Butte Drive  
Eugene, OR 97401  
[nrb95@yahoo.com](mailto:nrb95@yahoo.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 10:11:48 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Greg Dawson  
18760 NW Idanha St.  
Portland, OR 97229  
[greg@internetcafeusa.com](mailto:greg@internetcafeusa.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 10:14:28 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
David Buck  
510 Nw 341st Ave  
Hillsboro, OR 97124  
buckd96@yahoo.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 10:14:52 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Aiman Al Khachi  
17487 SW Roger Ln  
Beaverton, OR 97078  
aalkhachi@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 10:19:01 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Tara Burke  
491 NE 17th Ave.  
Hillsboro, OR 97124  
[woodenquartet@frontier.com](mailto:woodenquartet@frontier.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 10:20:05 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
David Burke  
491 NE 17th Ave.  
Hillsboro, OR 97124  
[monsieurburke@mac.com](mailto:monsieurburke@mac.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 10:27:55 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Walt Ryder  
5426 Summerlake St SE  
Salem , OR 97306  
walt\_ryder@yahoo.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 10:32:26 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Hannah Burke  
491 NE 17th Ave.  
Hillsboro, OR 97124  
[cellohannah@frontier.com](mailto:cellohannah@frontier.com)

**From:** [Julie Yeager \(jafy@comcast.net\) Sent You a Personal Message](mailto:jafy@comcast.net)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Tuesday, October 10, 2023 10:34:08 AM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Julie Yeager  
11473 S Riverwood Rd, Portland OR 97219  
Portland, OR 97219  
jafy@comcast.net  
(503) 675-1223

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Julie Yeager \(jafy@comcast.net\) Sent You a Personal Message](mailto:jafy@comcast.net)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Tuesday, October 10, 2023 10:34:13 AM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Julie Yeager  
11473 S Riverwood Rd, Portland OR 97219  
Portland, OR 97219  
jafy@comcast.net  
(503) 675-1223

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 10:34:29 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Jaiden Hiskey  
491 NE 17th Ave.  
Hillsboro, OR 97124  
jaidhiskey@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 10:36:41 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
PAT BIGELOW  
28700 SE AHLEY RD  
BORING, OR 97009  
PKBIGELOW@COMCAST.NET

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 10:49:22 AM

---

Dear Nicole Singh,

I was an information officer for two large energy companies, oil and nuclear, for ten years. To have an industrial age, there is no escape from the utilization of fossil fuels. Prior to the industrial age, the carrying capacity of the earth was thought to be around one billion people. No matter what we do, great disruptions are coming as fossil fuels near exhaustion. There is no legislative or technical escape from what is coming. All the regulations you are contemplating are senseless and serve only to placate profoundly uninformed elites.

Sincerely,  
Eugene Brown  
6646 Doral Dr SE  
Salem, OR 97306  
ecbat60@comcast.net

**From:** [Richard Lathrop](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Tuesday, October 10, 2023 10:50:07 AM

---

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Richard Lathrop  
41950 Old Mill Rd  
Port Orford, OR 97465  
rlathrop@msn.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Tuesday, October 10, 2023 10:51:21 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Karen Phillips  
5540 NW Shasta Ave.  
Corvallis, OR 97330  
karen-007@comcast.net

**From:** [Civicklick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 10:53:07 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

As a concerned consumer I understand the need to address climate change but the changes must reflect the best possible outcomes for all.

Sincerely,  
Jenna Rose  
3427 NE 12 th Street  
Portland , OR 97212  
[jensco1967@gmail.com](mailto:jensco1967@gmail.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 10:55:36 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Charles Neal  
17153 NE Flanders Way  
Portland, OR 97230  
loves2loop@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Tuesday, October 10, 2023 11:00:01 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Marina Bianco  
Stephen Bianco  
EUGENE, OR 97402  
Sement1@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 11:06:18 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Beth Zulaski  
1700 N Libra Street  
Newberg , OR 97132  
Zulaskimom@yahoo.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Tuesday, October 10, 2023 11:07:19 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
John Fertig  
1650 Partridge Ct  
Stayton, OR 97383  
[john\\_fertig2003@yahoo.com](mailto:john_fertig2003@yahoo.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Tuesday, October 10, 2023 11:13:31 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Pamela Brunell  
3705 Tunbridge Wells St SE  
Salem, OR 97302  
slappypam@aol.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Tuesday, October 10, 2023 11:22:49 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

We need every possible option to meet climate change goals world wide!

Sincerely,  
David Hess  
22 Marsh Lane  
Glenden Beach, OR 97388  
hessd@ohsu.edu

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 11:37:58 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
William Junell  
6945 Winfield Ct  
Gladstone, OR 97027  
bababilly@comcast.net

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Don't hold Oregonians hostage to a pseudo-science and social justice agenda!  
**Date:** Tuesday, October 10, 2023 11:39:24 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Dion Morehouse  
778 SE 21st Court  
Hillsboro, OR 97123  
dpmore69@comcast.net

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Tuesday, October 10, 2023 11:42:34 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
William Comstock  
16257 SE Katie Ct  
Milwaukie , OR 97267  
[bandc70comstock@gmail.com](mailto:bandc70comstock@gmail.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Tuesday, October 10, 2023 11:49:28 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Mike Follis  
4057 SE Jefferson St  
Portland, OR 97222  
mvfollis@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 11:57:32 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Art LANCE  
17468 SE Reserve Loop  
Milwaukie, OR 97267  
[art.lance@gmail.com](mailto:art.lance@gmail.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Tuesday, October 10, 2023 11:58:58 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Eileen Parfrey  
45 Hillshire Drive  
Lake Oswego, OR 97034  
eparf65@gmail.com

**From:** [Terry Sladky](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Tuesday, October 10, 2023 12:10:06 PM

---

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Terry Sladky  
18235 Seaman St  
Sandy, OR 97055  
tsladky@msn.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 12:10:16 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Anthony Lash  
7180 SW Crestdale Ct.  
Portland, OR 97225  
blrunner1863@yahoo.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 12:16:25 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Sheri MacDowell  
62 Touchstone  
Lake Oswego, OR 97035  
[sherim@macguard.com](mailto:sherim@macguard.com)

**From:** [Nadene LeCheminant](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Tuesday, October 10, 2023 12:19:34 PM

---

You don't often get email from nadene@yatesguitar.com. [Learn why this is important](#)

Dear 2023 DEQ Climate Rulemaking,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane (aka renewable natural gas (RNG)) used for CPP compliance to that which produces direct benefits for Oregonians – projects that reduce pollution in Oregon.
- 2) Disallowing hydrogen to be used for CPP compliance unless it is green electrolytic hydrogen (made from renewable energy sources like solar and wind). Why? Not all hydrogen is created equally. Where and how it is produced and used matters significantly when it comes to emissions reduction – if it's produced from fossil fuels out-of-state, it could be more polluting than even natural gas.
- 3) Strengthening emissions reduction requirements for new or expanded large industrial facilities in Oregon under the CPP's Best Available Emissions Reduction (BAER) program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they

benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,  
Nadene LeCheminant  
1665 Cottage St SE  
Salem, OR 97302

**From:** [morton Smith \(mortysmith36@gmail.com\) Sent You a Personal Message](mailto:mortysmith36@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Tuesday, October 10, 2023 12:21:06 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

morton Smith  
129 Fifth St  
Ashland, OR 97520  
mortysmith36@gmail.com  
(541) 482-7292

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 12:22:20 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Ray Martens  
21210 NE Niederberger Rd  
Dundee, OR 97115  
[martens.xray@yahoo.com](mailto:martens.xray@yahoo.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 12:30:02 PM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
DOUGLAS PERLE  
1945 BERRY ST SE ,SALEM, OR  
SALEM, OR 97302  
perle37@msn.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 12:42:49 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Charles Rouse  
17684 SW Frederick Ln.  
Sherwood, OR 97140  
charlie\_rouse@hotmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 12:43:46 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Andrew thomas  
1172 SW COURTNEY LAINE DR  
MCMINNVILLE, OR 97128  
andrewt503@outlook.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Tuesday, October 10, 2023 12:46:20 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Jerald Gaidos  
923 Julie Ln.  
Molalla , OR 97038  
[jerrygaidos@gmail.com](mailto:jerrygaidos@gmail.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 12:51:49 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Tim Thompson  
694 Trinity St NE  
Albany , OR 97322  
timt26@comcast.net

**From:** [NANCY AHNERT](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Climate Protection Plan  
**Date:** Tuesday, October 10, 2023 12:55:31 PM

---

You don't often get email from nancy4875@comcast.net. [Learn why this is important](#)

Please stay strong in the face of industry push back to weaken the Climate Protection Plan.

I am concerned that of 14 members of the rule-making advisory committee, only two are public interest groups. How can such a heavy reliance on the regulated industries' input serve the public interest?

Also, I am concerned that the current proposed rule amendments will compromise the program's intended public health, economic, and employment goals, and hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities.

Northwest Natural Gas is already seeking to comply with the CPP by purchasing Renewable Thermal Certificates associated with RNG outside of Oregon. Please strengthen requirements by restricting bio-methane used for CPP compliance to that which would produce direct benefits to Oregonians by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon.

Also please strengthen emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program. As the only existing state regulation on major industrial emitters, it is vital that the CPP works to ensure science-based emissions reductions from existing stationary sources and deter development of new stationary sources in Oregon. I live in Eugene, where J. H. Baxter company polluted neighboring residential lots, causing severe damage. I really appreciate the DEQ's part in getting this pollution stopped.

The Climate Protection Plan is a wonderful program. Your work to keep it strong is very important.

Thank you for working to retain a robust Climate Protection Plan, and your time to consider my comments.

Sincerely,

Nancy Ahnert

Eugene, Oregon resident

**From:** [Zibby keaton](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rule Making  
**Date:** Tuesday, October 10, 2023 12:55:52 PM

---

You don't often get email from [zwkeaton@gmail.com](mailto:zwkeaton@gmail.com). [Learn why this is important](#)

Chair George, Vice Chair Baraso, members of the Commission:

My name is Elizabeth Keaton and I am a volunteer with Families for Climate. I am a parent to two Oregonian children and I am writing this testimony because as they're parent my most fundamental responsibility is to protect them from harm, and irreversible climate change gravely threatens their future.

The Climate Protection Program is absolutely critical for Oregon to reduce our climate pollution on the urgent timeline dictated by current science. However, I am deeply concerned that the current proposed rules would undermine the effectiveness of the CPP, and put the necessary emissions reductions out of reach.

Specifically, I am worried that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane offsets, which will hinder the transition to non-emitting alternatives, while failing to deliver direct benefits to Oregonians. I am also worried that the rules as currently written will allow new industrial emitters to produce unrestricted climate pollution in Oregon.

I am asking DEQ to make the following important changes to the rulemaking:

1. **Restrict biomethane (aka renewable natural gas (RNG) and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians.** The stated goals of the CPP are to reduce greenhouse gas emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers, and out-of-state offsets accomplish none of those goals.
2. **Strengthen emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction (BAER) program.** As the only existing state regulation on major industrial emitters, it is vital that the CPP works to ensure science-based emissions reductions from existing stationary sources and deter development of new stationary sources in Oregon. Given Oregon's growing industrial sector, it is especially critical that DEQ use this rulemaking to strengthen the integrity of the BAER program. Large industrial emitters must be held accountable for their climate pollution.

Oregon families need the Climate Protection Program to live up to its name. Please strengthen the rules so it can protect our children's future, not corporate profits.

Thank you for the opportunity to comment on this rule making and please make Oregon be the voice of climate change our country needs!

Respectfully,

Elizabeth

Sent from my iPhone

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 1:01:01 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Greg Williams  
17250 SW Augusta Ln  
Beaverton, OR 97003  
coolneo-2@frontier.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 1:08:20 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
James Gamble  
4767 Calumet Way  
Eugene , OR 97404  
[Jimgamble76@gmail.com](mailto:Jimgamble76@gmail.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Tuesday, October 10, 2023 1:13:46 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Marlene Clark  
19445 S Vincent Dr  
Oregon City, OR 97045  
[marleni.c@comcast.net](mailto:marleni.c@comcast.net)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Tuesday, October 10, 2023 1:14:32 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Colin Clark  
19445 S Vincent Dr  
Oregon City, OR 97045  
[westlake.appraisal@comcast.net](mailto:westlake.appraisal@comcast.net)

**From:** [Linda Frank](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** State Action Addressing Climate Crisis  
**Date:** Tuesday, October 10, 2023 1:23:47 PM

---

You don't often get email from lindadfrank@msn.com. [Learn why this is important](#)

I am an Oregonian who wants state action to address the climate crisis, and I oppose efforts to weaken the Best Available Emissions Reduction rules. I urge rules that put polluting industries on a downward trajectory of emissions;

The DEQ must adopt rules consistent with the CPP as approved by the Environmental Quality Commission.

Please make the rules as rigorous as possible to assure a reduction in carbon emissions.

Thank you,

Linda Frank, Bend Oregon

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 1:24:45 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Richard Thompson  
6747 Pelton Ct SE  
Salem, OR 97306  
rthomps@q.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 1:27:17 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Paul Westerberg  
2670 NW 19th Avenue,  
Albany,, OR 97321  
[paulwesterberg@comcast.net](mailto:paulwesterberg@comcast.net)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 1:36:40 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
James harding  
2829 sw 33  
gresham, OR 97080  
jamesg4170@frontier.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 1:48:51 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Michael TerBush  
30985 NW Pacific St  
North Plains, OR 97133  
terbrat2@gmail.com

**From:** [Bill Cassidy](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, October 10, 2023 1:52:00 PM

---

You don't often get email from ordinaryacorn@gmail.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

However, I was disappointed to hear that the recent rule-making table did not include community input, and also that the results lacked in meeting the plan's original goals of reducing greenhouse gas emissions by 50%, providing meaningful investments to benefit Oregonians, and holding big polluters accountable.

Therefore, I am calling on the DEQ to adapt the rules for CPP implementation to focus on the original goals of:

- 1) Reducing greenhouse gas emissions and other air pollutants, maximizing public health benefits, and minimizing costs for consumers in environmental justice and other communities in Oregon.
- 2) Keeping economic and health benefits of the Community Climate Investment program in Oregon: investments should materially benefit Oregonians at the frontlines of pollution and the climate crisis, rather than paying for cheap offsets in other places.
- 3) Achieving real reduction of emissions by 50%, rather than allowing companies to invest in biomass-derived fuels such as "renewable natural gas" (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
- 4) Holding big polluters accountable to engage in science-based "best available emissions reductions" (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.
- 5) Returning the date for a "new source" of stationary pollution to December 31, 2021.

The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
Bill Cassidy  
3312 NE Holman St  
Portland, OR 97211

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Tuesday, October 10, 2023 1:54:22 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Kenneth P. Kentch  
503 SW Hayter St.  
Dallas, OR 97338  
1am4rnps@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 2:00:40 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Maarten deVriend  
321 12th Ave SW  
Albany, OR 97321  
mdevriend123+natural@gmail.com

**From:** [Becky Bes](#)  
**To:** [2023 Climate - DEQ](#)  
**Subject:** DEQ rules  
**Date:** Tuesday, October 10, 2023 2:01:48 PM

---

You don't often get email from [cobbedalot2@gmail.com](mailto:cobbedalot2@gmail.com). [Learn why this is important](#)

Dear DEQ personnel,

I am writing to ask you to do all you can to ensure that Oregon moves forward on reducing the causes of climate-warming. Please do not allow fossil fuel industries to coerce you into allowing continued and new pollution.

**Please do not change anything that would undermine the CPP!** It is a program that is essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18 month engagement process.

I am concerned that DEQ's currently proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit increased climate pollution in Oregon and elsewhere.

I therefore strongly urge DEQ to amend the proposed rules by:

Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians.

Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon.

I also strongly support maintaining protective restrictions on biomethane accounting, including notably, that synthetic methane derived from anthropogenic carbon sources does not comply with the CPP.

Doing so will not only help ensure that Oregon reduces emissions risks, but will also maximize the associated job creation, cost saving, public health, and economic development benefits for Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments. Let's stay on track to achieve our climate goals. Thank you for your service. Let's make our children proud.

M R Buddenhagen

19145 Upper Cow Creek

Azalea, OR 97410

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 2:06:59 PM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Phil Sterle  
2812 se 120 ave  
Portland, OR 97266  
[Longlonesomehighway66@gmail.com](mailto:Longlonesomehighway66@gmail.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 2:23:32 PM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Robert Powell  
12490 SW 27th Street  
Beaverton, OR 97008  
Anselrob@aol.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 2:31:57 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Nancy Grinnell  
1376 NE Charles Ct  
Fairview, OR 97024  
fvv1376@gmail.com

**From:** [Payton Smith](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Cc:** [Jason Smith](#); [Stacy Stiefel](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 2:35:47 PM

---

You don't often get email from payton@southportlumber.com. [Learn why this is important](#)

To whom it may concern,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ **not** to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because new opportunities for development across will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities. All this does it push business to areas with less stringent climate regulations, which in turn results in more emissions.

Please confirm that DEQ will **not** include geographic limits for decarbonized fuels like renewable natural gas and **will** allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule. While we welcome programs that benefit the environment, all this does is add financial stress to Oregonians without actually achieving any emission reductions.

**Please keep costs down and focus this program on quantifiable solutions to address climate change.**

Sincerely,

Payton Smith

*Director of Communications and Government Affairs*

w: (541) 756-7540 ext. 220  
m: 541-252-1890

P.O. Box 298  
Coos Bay, OR 97420



**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 2:46:00 PM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Sherry Howell  
2405 Glen Haven Rd  
Lake Oswego, OR 97034  
Howellsherry@hotmail.com

**From:** [Sarabelle Young](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Tuesday, October 10, 2023 2:51:18 PM

---

[You don't often get email from purplegma2@g.comail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Sarabelle Young  
1142 SW 8TH AVE  
ONTARIO, OR 97914  
[purplegma2@g.comail.com](mailto:purplegma2@g.comail.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Tuesday, October 10, 2023 2:53:57 PM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Dalece Lauck  
52477 BIRD RD  
Scappoose, OR 97056  
dalecek@yahoo.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Tuesday, October 10, 2023 2:54:44 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Michael Lauck  
52477 Bird Road  
Scappoose, OR 97056  
[jm\\_lauck@yahoo.com](mailto:jm_lauck@yahoo.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 2:56:58 PM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Tami Nicholson  
1547 Newport Way  
Woodburn, OR 97071  
[Trenee.nicholson@gmail.com](mailto:Trenee.nicholson@gmail.com)

**From:** [Holly G Pence](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Climate Protection Rulemaking  
**Date:** Tuesday, October 10, 2023 2:57:11 PM

---

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This is in reference to the request for comments posted at <https://ormswd2.synergydcs.com/HPRMWebDrawer/Record/6391239/File/document>.

I have reviewed the material, and find the proposed rules to be fair and reasonable. The development of "chain of custody" for our energy sources, from initial production to final use, will help us better understand our markets and real-world infrastructure. Suppliers and distributors will likely complain of the increase in recordkeeping burdens, but I do not regard that as sufficient objection. Having accurate knowledge will be an indispensable support in our efforts to decarbonize.

I would encourage the EQC to adopt the proposed rules.

Holly G Pence  
North Portland

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 2:58:13 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Rick Nelson  
1805 SE 61ST CT  
Hillsboro, OR 97123  
ricknelson63@hotmail.com

**From:** [Donna Bonetti](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Comment for DEQ 2023 Climate Rulemaking  
**Date:** Tuesday, October 10, 2023 2:58:25 PM

You don't often get email from donnambirdlady@yahoo.com. [Learn why this is important](#)

Department of Environmental Quality,

Thank you for letting me comment on DEQ's 2023 climate rulemaking. I have studied some atmospheric science and worked in an atmospheric science lab as staff so I am well aware of the critical importance of addressing climate change. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate, ecosystems globally and for communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking is extremely important for ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP— a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon. Biomethane like any methane is a very powerful greenhouse gas with a huge potential to contribute to climate change.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane or hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Sent  
from  
my  
iPad

Sincerely,

Donna Bonetti  
1997 Oak St.  
North Bend, OR 97459

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 3:09:04 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Mike Meogrossi  
17427 NW Fieldstone Drive  
Beaverton, OR 97006  
hornswith@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Tuesday, October 10, 2023 3:28:34 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Ethan S-G  
Riverview St  
Eugene, OR 97403  
[ethan.p.s.g@gmail.com](mailto:ethan.p.s.g@gmail.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Tuesday, October 10, 2023 3:33:08 PM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Gilbert McCutcheon  
16795 NW YORKTOWN DR  
BEAVERTON, OR 97006  
mmconslt@frontier.com

**From:** [Jason Cole](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Proposed Rulemaking on Bio Methane, Lookback & Book and Claim.  
**Date:** Tuesday, October 10, 2023 3:37:29 PM

---

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## A Plea for Fair Consideration: **DEQ 2023 Proposed Rulemaking on Bio Methane, Lookback & Book and Claim.**

The State Oregon Department of Environmental Quality (DEQP is seeking feedback from the advisory committee and the public on these factors and the proposed changes to the reporting requirements:

Dear Department of Environmental Quality (DEQ) Team,

As a concerned business owner in the State of Oregon, I want to take a moment to express concerns and perspectives regarding proposed DEQ changes to Bio-Methane regulation, Book and Claim accounting, all types of commercial Hydrogen and the “Lookback” for Covered Entities as outlined in the 2023 Rulemaking process.

First and foremost, we wish to emphasize that petroleum-based energy, while often criticized, plays a crucial role in our state's economy and energy reliability. It provides not only energy but also economic development opportunities and contributes significantly to job creation within Oregon. It is essential that we view all energy choices in the portfolio holistically, considering both the benefits and potential costs, particularly in terms of economic impact and human flourishing.

During the discussions held by Zoom DEQ climate Rulemaking Public Hearing on September 18<sup>th</sup>, it was apparent that certain groups held reservations about allowing covered entities in Oregon to further utilize widely accepted book and claim accounting for Bio-Methane originating from other states. However, these groups seem to also support the utilization of electric vehicles manufactured elsewhere outside of the state, as well as the importation of electricity generated outside of Oregon without a direct economic benefit to our citizens. Consequently, the standards being proposed for Bio-Methane

appear to differ from those standards when applied to out-of-state electricity.

We urge DEQ to maintain the current regulations pertaining Bio-Methane without any further regulation changes. The book and claim accounting procedure has proven to be entirely suitable for the utilization of out-of-state Bio-Methane in Oregon's electricity generation sector. Historically, the covered entities within our state that generate electricity have dutifully complied with DEQ's established rules. Altering these rules would likely result in increased electricity costs, which would ultimately affect consumers, including those in environmental justice communities that DEQ advocates for. Therefore, to minimize costs for all Oregonians in order to achieve an equitable outcome for all, DEQ should refrain from altering these existing regulations. The reality is that forthcoming technological advancements hold the promise of reversing the upward trajectory of CO<sub>2</sub> levels when the need arises. However, what cannot be reversed is the profound economic distress inflicted upon climate justice communities if DEQ were to approve hastily and further eliminate CO<sub>2</sub> emissions by reshaping existing CHG program rules while giving undue credence to climate change advocacy groups. We ask that all opinions be considered and used as input in shaping future policy.

We strongly believe that Bio-Methane should not be subject to geographical constraints when it comes to book and claim reporting. DEQ should not require that Bio-Methane be injected into a natural gas pipeline within the State of Oregon. Furthermore, there should be no restrictions on the vintage use of Bio-Methane for greenhouse gas reporting, and no time constraints should be imposed. Bio-Methane should be allowed to be claimed and delivered to end-users within our state, even if it displaces natural gas used in a pipeline connected to Oregon. Renewable CNG is nothing short of a miraculous energy source that should not be disparaged. DEQ should encourage more Renewable CNG.

The book and claim regulations initially established by DEQ at the inception of the Greenhouse Gas Reporting program should remain unchanged. These regulations have served Oregon well, striking a balance between environmental concerns and the practical realistic needs of our state's energy infrastructure.

Hydrogen, being derived from Natural Gas via reforming, often referred to as “Gray Hydrogen”, boasts considerably lower emissions compared to conventional gasoline. Moreover, Blue Hydrogen, produced through the same Natural Gas feedstock with carbon capture, presents an even more environmentally friendly option. In our view, these alternatives merit a substantial role in the broader Hydrogen conversation. Additionally, the prospect of generating hydrogen from coal, known as brown hydrogen, adds further complexity to the discussion since the USA has an abundant 750-year supply of Coal.

In addition, we must recognize that while electric vehicles are promoted as a more environmentally friendly alternative, they are not entirely carbon neutral. The production of electric vehicles outside of the State of Oregon contribute to an overall EV carbon footprint and does not directly benefit our state's economy. It is essential to consider the entire lifecycle of these vehicles and make informed decisions that weigh their environmental impact against their economic implications compared to reliable, abundant fossil fuels.

We appreciate your time and consideration of these viewpoints. Our aim is to ensure a comprehensive evaluation of the proposed changes, keeping in mind the well-being of our state and its citizens. We trust that DEQ will make decisions that are fair, balanced, and in the best interests of Oregon.

Should DEQ proceed with altering book & claim, it risks triggering an energy crisis in Oregon, a crisis that may jeopardize the well-being of our citizens, leading to energy instability in the winters ahead. Responsibility for such a crisis would rest squarely on the shoulders of the anti-fossil-fuel movement in Oregon and DEQ directly.

In conclusion, we respectfully urge DEQ to consider amending regulations to incorporate a one-year lookback period. Such a revision would prove advantageous for all covered entities, including newcomers to the state’s petroleum market, and contribute to a more equitable and sustainable approach to our state's energy future.

Thank you for your commitment to responsible governance and environmental

stewardship.

Thank you,

Jason Cole

**From:** [Erik Fisher \(erikfisher@earthlink.net\) Sent You a Personal Message](mailto:erikfisher@earthlink.net)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Tuesday, October 10, 2023 3:55:32 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

I appreciate Oregon's efforts to address climate change and strongly support the intent of the proposed rules. I just ask that they be done with an eye to directly benefiting Oregonians as much as possible. And -- that the rules reflect that climate change has begun, is accelerating, and will profoundly impact Oregon. The better prepared we are, the less likely that these impacts will devastate communities. In the future's restrospectoscope, only the bolder actions will look commendable.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Erik Fisher  
2660 Fairmount Blvd  
Eugene, OR 97403  
[erikfisher@earthlink.net](mailto:erikfisher@earthlink.net)  
(541) 343-3608

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 3:59:45 PM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Gary Folstrom  
456 S Linden St, Cornelius, OR, 97113  
Cornelius, OR 97113  
gdfolstrom@yahoo.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Tuesday, October 10, 2023 4:18:54 PM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Greg Wilson  
16350 SE Bel Air Dr  
Damascus , OR 97089  
fivewilson1@icloud.com

**From:** [Carlson, Nina](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Letter comments on DEQ CPP rulemaking on behalf of Miles Fiberglass  
**Date:** Tuesday, October 10, 2023 4:19:22 PM  
**Attachments:** [NW Natural Letter.docx](#)

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You don't often get email from [nina.carlson@nwnatural.com](mailto:nina.carlson@nwnatural.com). [Learn why this is important](#)

Please find attached letter of comments on behalf of Miles Fiberglass.

NC

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 4:25:11 PM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
MANDI PARROTTE  
5700 SW 187TH PL  
BEAVERTON, OR 97078  
mlparrotte@hotmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Tuesday, October 10, 2023 4:29:34 PM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
John Sorensen Sr  
6421 NE Roselawn St  
Portland , OR 97218  
[jdsorensen9@msn.com](mailto:jdsorensen9@msn.com)

**From:** [Mary Jarvis](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Tuesday, October 10, 2023 4:30:06 PM

---

Dear Climate DEQ,

I have been without electricity in winter before. My natural gas fireplace was a lifesaver as temperatures fell. Also, we notice that natural gas as fuel is clean and affordable. Why would we not promote this abundant resource?

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Mary Jarvis  
548 N Main St Apt 432  
Ashland, OR 97520  
[mary\\_lynne\\_jarvis@yahoo.com](mailto:mary_lynne_jarvis@yahoo.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 4:35:44 PM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Robert Loepf  
16154 Northwest Birdie Lane  
Portland, OR 97229  
[bloepfjr@msn.com](mailto:bloepfjr@msn.com)

**From:** [Ken Bonetti](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** ODEQ-Please Strengthen Climate Rules for 2923  
**Date:** Tuesday, October 10, 2023 4:36:03 PM

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You don't often get email from kenecon2004@gmail.com. [Learn why this is important](#)

Department of Environmental Quality:

My name is Ken Bonetti from North Bend. Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking as that will have far-reaching consequences for the climate and communities in Oregon.

Well-designed rules for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP) – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon. If such is allowed to happen, DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support after an extensive 18 month rulemaking and stakeholder engagement process.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane or hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I hope you will take these recommendations and make them part of the DEQ's rules and thereby protect Oregon residents and our climate from large new sources of climate pollution.

Sincerely,

Ken Bonetti

1997 Oak St.

North Bend, OR 97459

**From:** [jean carlton](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Please make rules as rigorous as possible to reduce carbon emissions  
**Date:** Tuesday, October 10, 2023 4:55:15 PM

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You don't often get email from jscarlton1768@gmail.com. [Learn why this is important](#)

**We are Oregonians who strongly support state action to address the climate crisis.**

To this end, we ask that you :

- oppose efforts to weaken the Best Available Emissions Reduction rules and urge rules that put polluting industries on a downward trajectory of emissions,
- that you oppose allowing gas utilities to import unlimited Renewable Natural Gas from out of state to offset emissions,
- that you oppose allowing gas utilities to use hydrogen unless the hydrogen is produced with electricity generated by renewable fuels,
- that DEQ must adopt rules consistent with the CPP as approved by the Environmental Quality Commission.

Thank you for your consideration,

Dr. Steven and Jean Carlton

Bend, Oregon

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 5:01:56 PM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
RHONDA SEWELL  
609 SW Cedar Ave.  
WARRENTON, OR 97146  
llama765@yahoo.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Tuesday, October 10, 2023 5:30:49 PM

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Dear Nicole Singh,

As senior citizens who rely on renewable natural gas to heat our home, my husband and I are appalled by the state's and DEQ's heavy-handed approach to limiting our energy options in the Climate Protection Program. This move unreasonably threatens our energy availability and feasibility.

In addition, the DEQ exaggerates the role of renewable natural gas in climate change scenarios, especially in comparison the primary sources of carbon emissions.

The perspective of targeting users of natural gas is an inequitable, ineffective, and costly means of carbon reduction.

Sincerely,  
Barbara Breaden  
2155 Devos St.  
Eugene, OR 97402  
blbreaden@yahoo.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 5:42:15 PM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Derek Willis  
1232 SE 13th place  
Canby, OR 97013  
Derekawillis@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Tuesday, October 10, 2023 5:49:20 PM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Mickie Fluckiger  
3030 Oxford Ave SE  
Albany, OR 97322  
3030cmf@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 5:54:59 PM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Katherine Baker  
426 SW Riverview Ave  
Gresham, OR 97080  
kcodanti@msn.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 6:11:22 PM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Eileen Hylton  
773 SE 33rd Ave  
Hillsboro, OR 97123  
eileenwhylton@prodigy.net

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Tuesday, October 10, 2023 6:42:26 PM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Ramon Garcia  
811 SW Summit View Drive  
Portland, OR 97225  
[beppo.rag@gmail.com](mailto:beppo.rag@gmail.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 7:10:06 PM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Louis Premazzi  
PO Box 989  
COTTAGE GROVE, OR 97424  
uncleloodis@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 7:46:48 PM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Janiece Howard  
15785 SE Anderegg Pkwy  
Damascus, OR 97089  
Littlebit53@aol.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Tuesday, October 10, 2023 8:15:28 PM

---

Dear Nicole Singh,

As an Oregonian, I'm quite concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because having more opportunities for development will increase supplies and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would have the same limiting impact as say excluding wind and solar resources from outside of Oregon, which would impact our ability to meet our clean electricity goals.

- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

- Arbitrary geographic boundaries simply don't improve our situation and will very likely increase costs for all Oregonians. I don't see that as the right path.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Jerry Allen  
623 Ironwood Terrace  
Woodburn, OR 97071  
[jerry4golf@hotmail.com](mailto:jerry4golf@hotmail.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 8:16:35 PM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
JIM SHAW  
211 NE PLYMOUTH CIRCLE  
CORVALLIS, OR 97330  
jimshawinc@icloud.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 8:20:32 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

It is not the role of government to impose limits on any kind of energy.

Further, the "SCIENCE" behind climate change is corrupt and flawed.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Ryan Seigneur  
1155 se 36th st  
Troutdale , OR 97060  
[Ryan.seigneur@comcast.net](mailto:Ryan.seigneur@comcast.net)

**From:** [robert albee \(purelyog@gmail.com\) Sent You a Personal Message](mailto:robert_albee@purelyog@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Tuesday, October 10, 2023 8:23:29 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

robert albee  
651 east intervale road  
grants pass, OR 97527  
purelyog@gmail.com  
(541) 415-0435

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Tuesday, October 10, 2023 8:24:37 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Beverly Meeks  
19610 Renee Way  
Oregon City, OR 97045  
[meeksjune724@gmail.com](mailto:meeksjune724@gmail.com)

**From:** [Gretchen King](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Climate Protection Plan  
**Date:** Tuesday, October 10, 2023 8:27:16 PM

---

You don't often get email from gretchen97520@gmail.com. [Learn why this is important](#)

I urge the DEQ to return to the original Climate Protection Plan. Community Climate Investment must promote social justice. Large emitters must be accountable for the pollution they produce, there can be no expansion of existing pollution sources, and there can be no development of new sources. This is just common sense if we are serious about eliminating our dependence on fossil fuels. There is no time to waste.

Thank you for taking comments.

Gretchen King, Ph.D.  
Ashland Oregon

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 8:49:42 PM

---

Dear Nicole Singh,

It's hard to believe that the DEQ is trying to make energy even more expensive at the same time inflation and high interest rates are killing us financially.

Please stop!

Sincerely,  
Paul Woods  
3781 NW Tyler Place  
Corvallis, OR 97330  
[paul\\_woods@ieee.org](mailto:paul_woods@ieee.org)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Tuesday, October 10, 2023 8:50:53 PM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Peter LaRocca  
14900 SW Michael Ct  
Sherwood, OR 97140  
Petelarocca@yahoo.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Tuesday, October 10, 2023 9:57:55 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Sean Nygaard  
11850 SW 12th ST  
Beaverton, OR 97005  
seannygaard@gmail.com

**From:** [Brice Suprenant](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Tuesday, October 10, 2023 9:58:40 PM

---

You don't often get email from bsuprena@gmail.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

However, I was disappointed to hear that the recent rule-making table did not include community input, and also that the results lacked in meeting the plan's original goals of reducing greenhouse gas emissions by 50%, providing meaningful investments to benefit Oregonians, and holding big polluters accountable.

Therefore, I am calling on the DEQ to adapt the rules for CPP implementation to focus on the original goals of:

- 1) Reducing greenhouse gas emissions and other air pollutants, maximizing public health benefits, and minimizing costs for consumers in environmental justice and other communities in Oregon.
- 2) Keeping economic and health benefits of the Community Climate Investment program in Oregon: investments should materially benefit Oregonians at the frontlines of pollution and the climate crisis, rather than paying for cheap offsets in other places.
- 3) Achieving real reduction of emissions by 50%, rather than allowing companies to invest in biomass-derived fuels such as "renewable natural gas" (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
- 4) Holding big polluters accountable to engage in science-based "best available emissions reductions" (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.
- 5) Returning the date for a "new source" of stationary pollution to December 31, 2021.

The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
Brice Suprenant  
5404 SE 68th Ave  
Portland, OR 97206

**From:** [Guy Pool](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Tuesday, October 10, 2023 10:40:09 PM

---

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Guy Pool  
245 Edgewood Dr  
Silverton, OR 97381  
ggnkpool@msn.com

**From:** [Kevin Hoar](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Tuesday, October 10, 2023 10:50:11 PM

---

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,  
Kevin Hoar

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Kevin Hoar  
8866 NW Mapleview Ter  
Portland, OR 97229  
kevinghoar@yahoo.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Tuesday, October 10, 2023 11:43:56 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Kenny Stoutt  
29610 SW Naples Dr  
Wilsonville, OR 97070  
[Kennystoutt@yahoo.com](mailto:Kennystoutt@yahoo.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Wednesday, October 11, 2023 1:31:27 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Joy Valine  
11760 SE 26th  
Milwaukie , OR 97233  
Jvaline461@gmail.com

**From:** [Christine Morris](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Wednesday, October 11, 2023 5:30:06 AM

---

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Christine Morris  
3942 Mack Ave  
Klamath Falls, OR 97603  
ca92morris@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Wednesday, October 11, 2023 6:23:33 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
wayne babcock  
3051camas st  
woodburn, OR 97071  
clipperwoodburn@wavecable.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Wednesday, October 11, 2023 6:30:17 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Fred Wallace  
2830 SW 209 Ave  
Aloha, OR 97003  
[fredandbecky@hotmail.com](mailto:fredandbecky@hotmail.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Wednesday, October 11, 2023 6:44:38 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
John Nearman  
7525 SW Danielle Ave  
Beaverton, OR 97008  
[john.nearman@gmail.com](mailto:john.nearman@gmail.com)

**From:** [Witmer, Pam](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** GHI Energy Comments to Rulemaking  
**Date:** Wednesday, October 11, 2023 6:51:02 AM  
**Attachments:** [GHI Energy Comments on Climate 2023 Rulemaking.pdf](#)

---

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Good morning,

GHI Energy is pleased to submit the attached comments in support of the Oregon Dept of Environmental Quality's Greenhouse Gas Reporting Program.

Thank you,  
Pam Witmer

Pam Witmer, VP Govt Affairs  
UGI Energy Services, LLC  
[pwitmer@ugies.com](mailto:pwitmer@ugies.com)  
610-373-7999 (office)  
717-579-8735 (cell)

**From:** [Stuart Greenleaf](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rules  
**Date:** Wednesday, October 11, 2023 7:08:53 AM

---

You don't often get email from scgreen94@outlook.com. [Learn why this is important](#)

From: Stuart Greenleaf, Eugene Oregon  
To: Department of Environmental Quality

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane or hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program

Stuart Greenleaf  
3455 Onyx Place, Eugene OR

**From:** [Becky Hakes](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Wednesday, October 11, 2023 7:10:10 AM

---

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Becky Hakes  
3262 Cheltenham Way  
Medford, OR 97504  
[beckyhakes@me.com](mailto:beckyhakes@me.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Wednesday, October 11, 2023 7:29:50 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
TOM O'BRIEN  
636 E OLIVE ST  
NEWPORT, OR 97365  
1journeyone@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down and Keep RNG Exploration Options Open  
**Date:** Wednesday, October 11, 2023 7:37:25 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Suzy deVriend  
321 SW 12th Ave  
Albany, OR 97321  
[rhea.snow@gmail.com](mailto:rhea.snow@gmail.com)

**From:** [Edwin Schmidtke \(nedsuz@sbcglobal.net\)](mailto:nedsuz@sbcglobal.net) Sent You a Personal Message  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 11, 2023 8:33:04 AM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

Please take climate change seriously. So far, our government says it but doesn't ACT it. Stop "Pay to Pollute",

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Edwin Schmidtke  
1827 N Jantzen Ave  
Portland, OR 97217  
[nedsuz@sbcglobal.net](mailto:nedsuz@sbcglobal.net)  
(773) 294-9260

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Wednesday, October 11, 2023 8:37:52 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Patty Herzog  
231 NE 5th ST  
McMinnville, OR 97128  
[patty@mcMinnvillebusiness.com](mailto:patty@mcMinnvillebusiness.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Wednesday, October 11, 2023 8:46:32 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Rudy Vanderzanden  
482 SE 26th Ave  
Hillsboro, OR 97123  
[rj.vander@frontier.com](mailto:rj.vander@frontier.com)

**From:** [Tesia Eisenberg \(eisenbergta@gmail.com\)](mailto:eisenbergta@gmail.com) Sent You a Personal Message  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 11, 2023 9:07:47 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Tesia Eisenberg  
1231 NE MLK Jr. Blvd  
Portland, OR 97232  
eisenbergta@gmail.com  
(503) 810-4952

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [bruce fontaine](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Wednesday, October 11, 2023 9:26:40 AM

---

You don't often get email from [bruce@brucefontaine.com](mailto:bruce@brucefontaine.com). [Learn why this is important](#)

“DEQ must ensure the Climate Protection Program stays on track to achieve its climate goals and deliver public health, economic, and job benefits for Oregon communities. Specifically, it is vital that DEQ strengthen its [current proposed rules](#) by:

1. Restricting biomethane (aka renewable natural gas (RNG)) used for CPP compliance to that which produces direct benefits for Oregonians – projects that reduce pollution in Oregon.
2. Disallowing hydrogen to be used for CPP compliance unless it is green electrolytic hydrogen (made from renewable energy sources like solar and wind). Why? Not all hydrogen is created equally. Where and how it is produced and used matters significantly when it comes to emissions reduction – if it's produced from fossil fuels out-of-state, it could be *more* polluting than even natural gas.
3. Strengthening emissions reduction requirements for new or expanded large industrial facilities in Oregon under the CPP's Best Available Emissions Reduction (BAER) program.”

I will add that Oregon compliance standards cannot be undermined by corporate attempts to circumvent the intended benefits to the environment.

Bruce Fontaine

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Wednesday, October 11, 2023 9:30:28 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Julia Cooper  
3519 Coronado way  
Klamath falls, OR 97603  
[judiecooperjc@gmail.com](mailto:judiecooperjc@gmail.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Wednesday, October 11, 2023 9:33:18 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Max Stille  
847 North Harbour Drive  
Portland, OR 97217  
mstille43@outlook.com

**From:** [Shannon Roseta](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Wednesday, October 11, 2023 10:10:07 AM

---

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Shannon Roseta  
1970 Dogwood Dr  
Eugene, OR 97405  
roseta@comcast.net

**From:** [Cindy Jones](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Wednesday, October 11, 2023 10:10:11 AM

---

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

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Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Cindy Jones  
2678 SE Hill St  
Prineville, OR 97754  
gramijo@ymail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Wednesday, October 11, 2023 10:12:59 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Steve Manley  
1847 Southwest Woodland Terrace  
LAKE OSWEGO, OR 97034  
Steve.virtus@outlook.com

**From:** [Teri Rudnick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Wednesday, October 11, 2023 10:20:08 AM

---

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

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Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Teri Rudnick  
12440 SW Metz St  
Beaverton, OR 97008  
terirudnick@yahoo.com

**From:** [Richard Hawkes](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Wednesday, October 11, 2023 10:20:09 AM

---

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

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Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Richard Hawkes  
22364 SE Bohna Park Rd  
Damascus, OR 97089  
hawkeyerc@comcast.net

**From:** [Terry Nash](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Wednesday, October 11, 2023 10:20:13 AM

---

[You don't often get email from [tknash@cbkfalls.com](mailto:tknash@cbkfalls.com). Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

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Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Terry Nash  
2509 Hawkins St  
Klamath Falls, OR 97601  
[tknash@cbkfalls.com](mailto:tknash@cbkfalls.com)

**From:** [Ronald Mauselle](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Wednesday, October 11, 2023 10:20:18 AM

---

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

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Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Ronald Mauselle  
10940 SW Barnes Rd PMB 150  
Portland, OR 97225  
zodman7@outlook.com

**From:** [Deborah Hackett](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Wednesday, October 11, 2023 10:30:07 AM

---

Dear Climate DEQ,

People NEED choice! Do NOT take away our ability to keep our families warm, fed, and safe! All power options should be accepted.

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

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Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Deborah Hackett  
993 Shoestring Rd  
Riddle, OR 97469  
e4hackett@yahoo.com

**From:** [Richard Wissmiller](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Wednesday, October 11, 2023 10:30:10 AM

---

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

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Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Richard Wissmiller  
7644 SW Green Valley Ter  
Portland, OR 97225  
dwiss@comcast.net

**From:** [Jennifer Rhodes](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Wednesday, October 11, 2023 10:30:13 AM

---

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

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Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Jennifer Rhodes  
79595 Wirkkala Rd  
Clatskanie, OR 97016  
[jenngrittman@gmail.com](mailto:jenngrittman@gmail.com)

**From:** [Michael Pooschke](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Wednesday, October 11, 2023 10:40:07 AM

---

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

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Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Michael Pooschke  
19275 Cantata Dr  
Oregon City, OR 97045  
mpooschke@aol.com

**From:** [Bruce Wood, USNR-R](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Wednesday, October 11, 2023 10:40:08 AM

---

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

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Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Bruce Wood  
544 Joseph St SE  
Salem, OR 97302  
navyret89@gmail.com

**From:** [Jeff Corbett](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Wednesday, October 11, 2023 10:40:12 AM

---

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

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Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Jeff Corbett  
1232 Woodside Dr  
Eugene, OR 97401  
jlc.llc@comcast.net

**From:** [Ray Martens](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Wednesday, October 11, 2023 10:50:05 AM

---

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

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Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Ray Martens  
21210 NE Niederberger Rd  
Dundee, OR 97115  
martens.xray@yahoo.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Wednesday, October 11, 2023 10:59:37 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Teresa Toren  
24285 SE Strawberry Dr  
Damascus, OR 97089  
teresatoren@gmail.com

**From:** [Dan Broome](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Wednesday, October 11, 2023 11:10:07 AM

---

Dear Climate DEQ,

No matter what the income or status families have this will effect everyone rich and poor. Stop attacking the people of this state and country with baseless extremist taxes and money grabs!

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

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Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Dan Broome  
496 N 6th St  
Saint Helens, OR 97051  
dbroome3@protonmail.com

**From:** [Drew Simrin](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Wednesday, October 11, 2023 11:13:48 AM

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You don't often get email from marioman3@gmail.com. [Learn why this is important](#)

Dear 2023 DEQ Climate Rulemaking,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane (aka renewable natural gas (RNG)) used for CPP compliance to that which produces direct benefits for Oregonians – projects that reduce pollution in Oregon.
- 2) Disallowing hydrogen to be used for CPP compliance unless it is green electrolytic hydrogen (made from renewable energy sources like solar and wind). Why? Not all hydrogen is created equally. Where and how it is produced and used matters significantly when it comes to emissions reduction – if it's produced from fossil fuels out-of-state, it could be more polluting than even natural gas.
- 3) Strengthening emissions reduction requirements for new or expanded large industrial facilities in Oregon under the CPP's Best Available Emissions Reduction (BAER) program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they

benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

We need to be doing all we can to reduce emissions in this critical period. We should only be using green hydrogen, and not pollute communities.

Sincerely,  
Drew Simrin  
104 Maynard Ave  
Eugene, OR 97404

**From:** [Sandra Nelson](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Wednesday, October 11, 2023 11:20:08 AM

---

Dear Climate DEQ,

Interestingly, I'm waiting in line at a DEQ Test Station as I compose this email, a long line with dozens of other cars with idle engines or constant restarts--all adding to the unhealthy gases! Furthermore, because of the high cost of this unnecessary test (I pass every time) and registration renewal, I am cutting into my food budget to pay for this. My guess is that no policy maker is in my position..

I KNOW that there are better ways to save our planet and people. Cheaper and more environmentally friendly energy resources exist. Solar and wind are not the way to go--for many reasons.

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Sandra Nelson  
13370 SW Barberry Dr  
Beaverton, OR 97008  
[sandran1949@gmail.com](mailto:sandran1949@gmail.com)

**From:** [Marcia Garland](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Wednesday, October 11, 2023 11:20:14 AM

---

Dear Climate DEQ,

Energy costs!!

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Marcia Garland  
7464 SW 48th Ave  
Portland, OR 97219  
[marcia.wrtr@gmail.com](mailto:marcia.wrtr@gmail.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Wednesday, October 11, 2023 11:24:51 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Craig Shelby  
PO Box 50304  
Eugene, OR 97405  
shelbycj@aol.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Wednesday, October 11, 2023 11:35:11 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change. The small decrease in CO2 from this rule will have zero measurable impact on Oregon's climate and increase costs. Please determine the cost/benefit of this rule. It is all cost and almost zero benefit

Sincerely,  
Randall Kimsey  
4191 Reed St.  
West Linn, OR 97068  
[rj7630@comcast.net](mailto:rj7630@comcast.net)

**From:** [Philip Weaver](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Wednesday, October 11, 2023 11:40:14 AM

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[You don't often get email from whitealfa@peak.org. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Philip Weaver  
1585 Long Island Dr  
Eugene, OR 97401  
whitealfa@peak.org

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Wednesday, October 11, 2023 11:47:12 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
David Knighton  
2560 Washington Street  
Eugene, OR 97405  
[davewknight11@gmail.com](mailto:davewknight11@gmail.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Wednesday, October 11, 2023 11:51:57 AM

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Dear Nicole Singh,

As we transition away from fossil fuels, we cannot ignore any renewable energy options. As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Steven Philpott  
870 Lariat Drive  
Eugene, OR 97401  
slphilpott@comcast.net

**From:** [Loeppky, Janna](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Avista Comments Submission  
**Date:** Wednesday, October 11, 2023 12:01:46 PM  
**Attachments:** [Avista ODEQ Climate 2023 Proposed Rulemaking Comments.1.pdf](#)

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You don't often get email from [janna.loeppky@avistacorp.com](mailto:janna.loeppky@avistacorp.com). [Learn why this is important](#)

Good Afternoon,

Please see the attached comments in response to the Climate 2023 Rulemaking (due October 13<sup>th</sup>). Please let me know if you have any follow-up questions or comments. Thank you in advance and have a nice day.

Sincerely,

**Janna Loeppky**  
Greenhouse Gas Program Lead  
*Environmental Compliance*

1411 E MISSION AVE | MSC-21 | SPOKANE, WA 99202  
PHONE 509-495-8809  
[www.myavista.com](http://www.myavista.com)



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**From:** [Garrett Bruno](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Wednesday, October 11, 2023 12:10:09 PM

---

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Garrett Bruno  
145660 Highway 97  
La Pine, OR 97739  
fanofsa@yahoo.com

**From:** [David Stone](#)  
**To:** [2023 Climate \\* DEQ](#); [Rep Lively](#); [Sen Prozanski](#); [Camilla Mortensen](#)  
**Subject:** Comment on new DEQ Climate 2023 Rulemaking  
**Date:** Wednesday, October 11, 2023 12:36:40 PM

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With all the greenwashing (deceptive claims of climate action), compliance with any new rules must be independently verifiable. False claims must be punished with non-negotiable fines. Public reporting must be provided for accountability. No cozy agreements, no loopholes for lawyers to exploit, no conflict of interest with investigators or enforcers. No unfair competition for businesses that comply. No corporate capture (rules made by those subject to the rules.)

Dave Stone  
Springfield

**From:** [Connie Bresee](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Wednesday, October 11, 2023 12:51:06 PM

---

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Connie Bresee  
874 Creekside Dr SE  
Salem, OR 97306  
[conniebresee@comcast.net](mailto:conniebresee@comcast.net)

**From:** [Mike SHOEMAKE](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Wednesday, October 11, 2023 1:10:07 PM

---

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Mike SHOEMAKE  
11346 SE Hondo Ct  
Prineville, OR 97754  
mshoemake100@gmail.com

**From:** [Gayle Drake](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Wednesday, October 11, 2023 1:10:11 PM

---

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Gayle Drake  
19766 NW Phillips Rd  
Hillsboro, OR 97124  
wowmom9@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Wednesday, October 11, 2023 1:24:40 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very upset about the lies, deceptions and money grab of the Climate Protection Program. I demand DEQ not to further increase costs by imposing geographic limitations on renewable clean natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for low income and middle class Oregonians.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon due to political justification.

- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities. Natural gas is low carbon. Ever see soot on a gas exhaust vent, NO! BTW CO2 is NOT A Greenhouse Gas! (<http://www.co2science.org>)

Please confirm that DEQ will not include geographic limits for decarbonized fuels like clean renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Now go educate yourself about what is driving recent weather changes. Climate has changed since day 1 and will continue to change to the end of days. Thank God for that otherwise we would still be in a "Ice Age". Climate change has become a political farce for the left wing nut party. They use it to gain power by spreading fear. Please go to <http://icecap.us/> to get educated. Some scientists have found they can make more money lying than being factual. Many other places to get educated. DEQ is comprised of un-elected officials placing crushing economic disaster on those already facing hardship from poor economic policy. The rich don't care, it is inconsequential to them, the poor and middle class carry the full burden. STOP this insanity NOW!

Please keep costs down and focus this program on quantifiable solutions to address clean water and air from toxic chemicals and natural radon sources which is of much greater concern.

Sincerely,  
John Ritchie  
27845 SW 207th Ave.  
Sherwood, OR 97140  
[mari2000@hevanet.com](mailto:mari2000@hevanet.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Wednesday, October 11, 2023 1:35:48 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Phyllis Stadler  
5548 SE Stark St  
Portland, OR 97215  
[lnpstadler@gmail.com](mailto:lnpstadler@gmail.com)

**From:** [Steve T](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment  
**Date:** Wednesday, October 11, 2023 1:37:36 PM

---

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Please allow enough latitude in your rule making so Oregonians can still earn a living in a wide range of industries.

Thank you,

Stephen Titus  
Tualatin, OR

**From:** [Roger Garland](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Wednesday, October 11, 2023 1:40:07 PM

---

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Roger Garland  
7022 SW Barbara Ln  
Portland, OR 97223  
rogpatg@hotmail.com

**From:** [Mark Darlenzo](mailto:Mark.Darlenzo)  
**To:** [2023 Climate - DEQ](#)  
**Subject:** Please strengthen proposed 2023 climate rules  
**Date:** Wednesday, October 11, 2023 1:58:40 PM

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Department of Environmental Quality,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking. As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules.

- 1) Restrict biomethane or hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthen emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.
- 3) Not use old AP-42 standards written by the oil industry with self-reporting based on the BAER survey. This methodology has been shown to vastly underestimate the amount of emissions by up to 59% and for the Climate Protection Plan to realistically address emission reductions is fully insufficient. Other states utilize the preferred new standards of EPA methods 204 and 325 to replace company guesstimates with actual air quality monitoring DATA, emissions inventories, and health assessments. Oregon DEQ should put an end to industry guesstimate self-reporting through an industry-stacked methodology.
- 4) The missing components to the carbon intensity (CI) value calculations, not being listed "Under OAR 340-215-0042 or 340-272-0455 under the documentation required sections, biofuels and other so-called renewable fuels, should not only report on feedstocks and production methodologies, but also on the fuels used for hydrogenation, esterification or other processing to adequately access the true Carbon intensity numbers. Reporting should also include the land change values necessary to determine what other crops the land could have produced for human consumption.
- 5) Not remove the phrase "additional documentation must be made available for verification upon request"
- 6) Not exempt exporters and transporters of fuels should and should have to list the final destination of the fuels(340-215-0115).
- 7) While they may utilize devices to reduce emissions during pumping phases, the open venting to reduce sparking must also be taken under consideration as should potential leakage from during storage and transfers.
- 8) Any substantive change of use should require a new ACDP (Air Contaminant Discharge Permit) or Title V permitting instead of being allowed to operate under old permits.

Finally, It is very disappointing that the roster of people involved in the rule making is heavily stacked by industry.

Thank you

Mark Darlenzo  
Portland OR 97213

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Wednesday, October 11, 2023 2:13:33 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Doug Sullivan  
815 Morse Ave SW  
Albany , OR 97321  
[douggernaut.777@gmail.com](mailto:douggernaut.777@gmail.com)

**From:** [Christine M Harris](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Wednesday, October 11, 2023 2:20:07 PM

---

Dear Climate DEQ,

Gas is a clean energy source both in extraction and use. It is also far more affordable than electric. In forcing these unsubstantiated "climate saving changes," legislators are placing an undue burden on middle and lower income individuals. Electricity has to come from somewhere. Where is legislation going to get it? Unreliable wind or solar? These have already been proven to be inadequate and expensive (look to California and Texas as proof). Lithium batteries which are strip mined, dangerous, and are environmental unsafe on disposal. Same goes for solar panels. How is this a better choice? Coal? Water? Nuclear? None of these answers will satisfy climate/environmental extremists. Do not cave to radical extremists. Look to actual facts, economics, and REAL science. Allow instead for industry to improve and create better systems. Rather than upending everything without a true scientific basis.

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Christine M Harris  
6020 SW 150th Ave  
Beaverton, OR 97007  
oredbird@aol.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Wednesday, October 11, 2023 2:22:18 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Christine M Harris  
6020 SW 150th Ave  
Beaverton, OR 97007  
oredbird@aol.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Wednesday, October 11, 2023 2:36:59 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Dave Vanderzanden  
863 NW 8th Dr  
Hillsboro, OR 97124  
davdz@msn.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Wednesday, October 11, 2023 2:37:55 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Catherine Tolls  
5032 SW 39th Dr.  
Portland, OR 97221  
Ctolls@comcast.net

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Wednesday, October 11, 2023 2:43:52 PM

---

Dear Nicole Singh,

By scanning through the reams of rule-making documents, it becomes immediately obvious that DEQ is a bloated agency wasting millions of our taxpayer dollars. No wonder you try to tax us in every way possible. It is not about saving the planet, since you can't even make a dent in China's new coal plant capacity. It is about the pure greed of progressivism.

Stop attacking our energy choices.

Sincerely,  
David Vanderzanden  
863 NW 8th dr  
Hillsboro, OR 97124  
[mospam@live.com](mailto:mospam@live.com)

**From:** [Krystine Alcock](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Wednesday, October 11, 2023 2:50:08 PM

---

Dear Climate DEQ,

Although our household does not use Natural Gas because of cost to have it pulled into our home. There are many people who use it and need it for better cost.

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Krystine Alcock  
1029 Herman St  
Myrtle Point, OR 97458  
[muddygirlbling@gmail.com](mailto:muddygirlbling@gmail.com)

**From:** [Amy Malaki](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Comments on "Book and Claim" under GGRP  
**Date:** Wednesday, October 11, 2023 2:56:28 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[231013 Comments on Climate 2023 Rulemaking\\_SkyNRG.pdf](#)

---

You don't often get email from amy@skynrg.com. [Learn why this is important](#)

Dear Ms. Singh and Ms. Abel,

Please find attached SkyNRG's comments on Oregon Department of Environmental Quality's draft regulation on "Book and Claim" under the state's Greenhouse Gas Reporting Program. We support the draft regulation as currently written given the importance of "book and claim" to scale up the development of RNG to SAF.

Sincerely,  
Amy Malaki



**Amy Malaki** (she/her)  
*Head of Policy and Sustainability*

[+1 \(206\) 579-7954](tel:+12065797954)

[www.skynrg.com](http://www.skynrg.com)



*This message and any attachment are confidential and may be privileged or otherwise protected from disclosure. If you are not the intended recipient, please telephone or email the sender and delete this message and any attachment from your system. If you are not the intended recipient you must not copy this message or attachment or disclose the contents to any other person.*

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Wednesday, October 11, 2023 3:08:53 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Shaun Cooper  
1235 Hilton Dr  
Klamath Falls , OR 97603  
Coopershaun7277@yahoo.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Wednesday, October 11, 2023 3:27:41 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Tracy Miller  
1394 ne ray ct  
Hillsboro, OR 97124  
Millertracy42@gmail.com

**From:** [Natasha Jackson](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking Comments  
**Date:** Wednesday, October 11, 2023 3:34:01 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[Double J Construction Letter to DEQ CPP Comments.pdf](#)

---

You don't often get email from njackson@nwga.org. [Learn why this is important](#)

Greetings,

Please accept the attached comments from Double J Construction Inc. on the 2023 Climate Rulemaking.

Thank you,



**Natasha Jackson**

Policy and Partnerships Manager

**Office:** 503-344-6637

**Mobile:** 208-446-8616

1914 Willamette Falls Drive, Suite 260  
West Linn, OR 97068

*Advocating for the role of the region's natural gas infrastructure in safely delivering a clean, dependable and affordable energy future.*

**From:** [Ray Stephens](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Wednesday, October 11, 2023 3:40:08 PM

---

Dear Climate DEQ,

Okay, I'm not against trying to clean up the environment. There are very few of the citizens of our state that are. But you have to use some common sense, which seems to be in very short supply nowadays. Stopping the production and use of natural gas would have a devastating impact on hundreds of thousands of residents in the Pacific Northwest and most certainly those on fixed incomes. Don't let those pushing bonehead extreme agendas limit and or eliminate an extremely needed and valuable resource.

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Ray Stephens  
748 Hood Ave  
Metolius, OR 97741  
[rhstephens748@gmail.com](mailto:rhstephens748@gmail.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Wednesday, October 11, 2023 3:42:14 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
David Blashishen  
722 ne 110th ave  
Portland, OR 97220  
davidblashishen@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Wednesday, October 11, 2023 4:11:30 PM

---

Dear Nicole Singh,

I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs on Oregonians by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

More importantly, any DEQ/Oregon program designed to address climate change is doomed to fail as Oregon activities are not the source of changes in climate. The vast majority of changes in climate are naturally occurring. Requiring Oregon's citizens to pay extra fees, taxes, or artificially increased costs to address this issue just causes poverty that could have been avoided. Please keep costs down and delete this and other climate change programs.

Sincerely,  
Tom Calabrese  
2830 SW Plum Circle  
Portland, OR 97219  
tom@calabrese.tc

**From:** [Eric Halperin](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rigorous rules for CPP  
**Date:** Wednesday, October 11, 2023 4:16:42 PM

---

You don't often get email from ehod1@yahoo.com. [Learn why this is important](#)

Hello,

I am writing in regard to the proposed rules for the Climate Protection Program. Please consider the following.

1. Polluting industries must be on a downward trajectory of emissions. Do not weaken the Best Available Emissions Reduction rules.
2. Do not allow gas utilities to import unlimited Renewable Natural Gas from out of state to offset emissions.
3. Only allow gas utilities to use hydrogen if the hydrogen is produced with electricity generated by renewable fuels.

DEQ must adopt rules consistent with the CPP as approved by the Environmental Quality Commission. DEQ must make the rules as rigorous as possible to assure a reduction in carbon emissions.

Thank you,

Eric Halperin  
Gearhart OR

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Wednesday, October 11, 2023 4:17:27 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Susan Mackey  
6921 NW Larch Drive  
Redmond, OR 97756  
Smacke2@msn.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Wednesday, October 11, 2023 4:20:26 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Judy Shallcross  
5531 Villa Dr  
Klamath Falls, OR 97603  
jeshallcross1@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Wednesday, October 11, 2023 4:23:23 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Nick Hunt  
9283 sw cascara ln  
Tualatin, OR 97062  
[Nicholas.hunt39@protonmail.com](mailto:Nicholas.hunt39@protonmail.com)

**From:** [Diana Helm](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking Comment  
**Date:** Wednesday, October 11, 2023 4:36:02 PM  
**Attachments:** [DEQ letter 10.11.23.docx](#)

---

You don't often get email from diana92960@aol.com. [Learn why this is important](#)

Please see attached.

Thank you,  
Diana

*Diana Helm*  
Owner  
Terra Casa, LLC  
503-577-8242  
[www.terraca.com](http://www.terraca.com)

**From:** [Lyle Pehan](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Wednesday, October 11, 2023 5:00:17 PM

---

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Lyle Pehan  
733 NE Galloway St  
McMinnville, OR 97128  
[lyle.pehan@gmail.com](mailto:lyle.pehan@gmail.com)

**From:** [Kristin Smith \(kristin262smith@yahoo.com\) Sent You a Personal Message](mailto:kristin262smith@yahoo.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 11, 2023 5:05:52 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Kristin Smith  
1430 NW Hoyt St. Apt. 1002  
Portland, OR 97209  
kristin262smith@yahoo.com  
(503) 449-4081

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Michael Glanz](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Wednesday, October 11, 2023 5:10:08 PM

---

Dear Climate DEQ,

Natural gas is just fine to use. Leave us alone.

The climate freaks can't even find an actual climate scientist that agrees that we are having a climate crisis.

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Michael Glanz  
8336 SW 24th Ave # 7  
Portland, OR 97219  
[mrglanz@ymail.com](mailto:mrglanz@ymail.com)

**From:** [Wayne Frey \(freywayne79@gmail.com\) Sent You a Personal Message](mailto:Wayne.Frey@sierraclub.org)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 11, 2023 5:10:13 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

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I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Wayne Frey  
5870 River Road N  
Keizer, OR 97303  
freywayne79@gmail.com  
(541) 709-8773

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Lynette Meadows \(lynette.lost@gmail.com\) Sent You a Personal Message](mailto:lynette.lost@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 11, 2023 5:16:34 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

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- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Lynette Meadows  
4630 NE Skidmore St  
Portland, OR 97218  
lynette.lost@gmail.com  
(503) 636-0054

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Darlene Norwood \(darlenenorwood@mac.com\) Sent You a Personal Message](mailto:darlenenorwood@mac.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 11, 2023 5:16:44 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

Time to Support Environmental Justice for Oregon

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Darlene Norwood  
4933 Cloudcroft Lane  
Florence, OR 97439  
darlenenorwood@mac.com  
(661) 265-5427

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Jennifer Doob \(jkdoophi@comcast.net\) Sent You a Personal Message](mailto:jkdoophi@comcast.net)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 11, 2023 5:17:35 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

Jennifer Doob  
3415 SE Stark Street  
Portland, OR 97214  
jkdoophi@comcast.net  
(510) 205-6970

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Hilary Brown \(hilary@mamboland.com\) Sent You a Personal Message](mailto:hilary@mamboland.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 11, 2023 5:17:37 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

Protect citizens, not polluters.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Hilary Brown  
2626 SE Washington St.  
Portland, OR 97214  
[hilary@mamboland.com](mailto:hilary@mamboland.com)  
(407) 592-2522

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [DICK DOLGONAS](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment  
**Date:** Wednesday, October 11, 2023 5:19:41 PM

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You don't often get email from [dolgonas@msn.com](mailto:dolgonas@msn.com). [Learn why this is important](#)

Greetings,

I want to submit my comments about the on the proposed [Climate 2023 Rulemaking](#), a joint rulemaking of DEQ's teams that implement the Greenhouse Gas Reporting Program (GHG RP), Third Party Verification (3PV) and Climate Protection Program (CPP).

I am concerned that the proposed rule is too reliant on offsets rather than strong actions that will truly reduce GHG emissions. We are fortunate to have strong, clear policies addressing the need to reduce GHG emissions, and I ask that the focus remain clearly on reductions rather allowing GHG emissions to continue to rise due to allowance of offsets.

Thank you.

Dick Dolgonas  
Roseburg, Oregon

**From:** [Greg Jacob \(jacobgk@comcast.net\) Sent You a Personal Message](mailto:jacobgk@comcast.net)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 11, 2023 5:21:22 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

I urge the DEQ to hold energy industries to Oregon industrial pollution limits; furthermore, it is no secret that "offset" is nothing more than a slick way for industries to poster than they are working to meet climate standards, but most often the industries put money toward biomethane and biomass, for example, rather than transition to clean energy. Help Oregon's CPP stay on tack to deliver the state's climate goals.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Greg Jacob  
1331 NE Parkside Dr.  
Hillsboro, OR 97124  
jacobgk@comcast.net  
(503) 747-8005

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club.

If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Becky Lippmann \(beclippmann@yahoo.com\) Sent You a Personal Message](mailto:beclippmann@yahoo.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 11, 2023 5:22:00 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

Becky Lippmann  
3962 Somerset Dr. NE  
Albany, OR 97322  
beclippmann@yahoo.com  
(541) 914-6263

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Tikhon Gilson \(tikhongilson@gmail.com\)](mailto:tikhongilson@gmail.com) Sent You a Personal Message  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 11, 2023 5:24:30 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

No more phony offsets!

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Tikhon Gilson  
130 SW Court Ave #303  
Pendleton, OR 97801  
[tikhongilson@gmail.com](mailto:tikhongilson@gmail.com)  
(541) 249-2338

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Marianne Nelson \(manelson316@yahoo.com\) Sent You a Personal Message](mailto:manelson316@yahoo.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 11, 2023 5:27:02 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

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Thank you for the opportunity to provide comments.

Sincerely,

Marianne Nelson  
1644 SE Rex St.  
Portland, OR 97202  
manelson316@yahoo.com  
(503) 231-2825

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Richard Clinton \(richard.clinton@oregonstate.edu\) Sent You a Personal Message](mailto:richard.clinton@oregonstate.edu)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 11, 2023 5:28:08 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

Richard Clinton  
1380 NW Magnolia  
Corvallis, OR 97330  
[richard.clinton@oregonstate.edu](mailto:richard.clinton@oregonstate.edu)  
(541) 753-3709

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Ben Platt \(benplatt59@gmail.com\)](mailto:benplatt59@gmail.com) Sent You a Personal Message  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 11, 2023 5:29:36 PM

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Thank you for the opportunity to provide comments.

Sincerely,

Ben Platt  
3837 SE Brooklyn St  
Portland, OR 97202  
benplatt59@gmail.com  
(720) 215-5025

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Jamrs Gardner \(jimg@ccgmail.net\)](mailto:jimg@ccgmail.net) Sent You a Personal Message  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 11, 2023 5:30:17 PM

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Thank you for the opportunity to provide comments.

Sincerely,

Jamrs Gardner  
20031 S Henrici Rd  
OREGON CITY, OR 97045  
jimg@ccgmail.net  
(503) 631-2632

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Chris Pitt \(cwpitt@yahoo.com\) Sent You a Personal Message](mailto:cwpitt@yahoo.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 11, 2023 5:33:33 PM

---

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To whom it may concern,

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However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Chris Pitt  
4505 SE Windsor Ct.  
Portland, OR 97206  
cwpitt@yahoo.com  
(583) 894-8529

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Jennifer McDaid \(goatgirlis@yahoo.com\) Sent You a Personal Message](mailto:goatgirlis@yahoo.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 11, 2023 5:35:11 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

I stand by my Propane on demand water heaters for in floor heating, potable water, and gas range.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Jennifer McDaid  
407 Wallowa Street, PO Box 102  
Lostine, OR 97857  
[goatgirlis@yahoo.com](mailto:goatgirlis@yahoo.com)  
(541) 398-2118

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Diana Roome \(dianarroome@gmail.com\) Sent You a Personal Message](mailto:dianarroome@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 11, 2023 5:35:11 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

There are too many ways for polluters to evade their responsibilities and even regulations, and we must stop this from happening in Oregon.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

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- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Diana Roome  
25 Allen Lane  
Talent, OR 97540  
dianarroome@gmail.com  
(541) 531-2890

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Kristin Harvey \(kittydiggins@gmail.com\) Sent You a Personal Message](mailto:kittydiggins@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 11, 2023 5:39:39 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

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- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Kristin Harvey  
13200 SE Arista Dr, Portland OR 97222  
Portland, OR 97222  
[kittydiggins@gmail.com](mailto:kittydiggins@gmail.com)  
(503) 654-1667

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Bessie Joyce](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Wednesday, October 11, 2023 5:45:48 PM

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You don't often get email from amanita4@gmail.com. [Learn why this is important](#)

Dear 2023 DEQ Climate Rulemaking,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane (aka renewable natural gas (RNG)) used for CPP compliance to that which produces direct benefits for Oregonians – projects that reduce pollution in Oregon.
- 2) Disallowing hydrogen to be used for CPP compliance unless it is green electrolytic hydrogen (made from renewable energy sources like solar and wind). Why? Not all hydrogen is created equally. Where and how it is produced and used matters significantly when it comes to emissions reduction – if it's produced from fossil fuels out-of-state, it could be more polluting than even natural gas.
- 3) Strengthening emissions reduction requirements for new or expanded large industrial facilities in Oregon under the CPP's Best Available Emissions Reduction (BAER) program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they

benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Oregon DEQ, please do every thing can to ensure Oregon has the best possible rules to regulate industry and reduce climate change.

Sincerely,  
Bessie Joyce  
295 15th st se  
Bandon, OR 97411

**From:** [Mary Bnuckley \(mbuckley@sbcglobal.net\) Sent You a Personal Message](mailto:mbuckley@sbcglobal.net)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 11, 2023 5:46:25 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Mary Bnuckley  
6525 NE 36th Avenue  
Portland, OR 97211  
[mbuckley@sbcglobal.net](mailto:mbuckley@sbcglobal.net)  
(503) 282-2590

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [A Michael Dianich \(mdianich@gmail.com\) Sent You a Personal Message](mailto:mdianich@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 11, 2023 5:48:57 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

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Thank you for the opportunity to provide comments.

Sincerely,

A Michael Dianich  
42740 E Larch Mt Rd  
Corbett, OR 97019  
mdianich@gmail.com  
(971) 344-1021

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Wednesday, October 11, 2023 5:49:47 PM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Eugenr Gott  
13590sw coach ct  
Beaverton, OR 97008  
Gott.mmef@gmail.com

**From:** [Bernadette Rodgers \(bernadetterodgers350@gmail.com\)](mailto:bernadetterodgers350@gmail.com) Sent You a Personal Message  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 11, 2023 5:54:08 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Bernadette Rodgers  
5105 SW Richardson Dr  
Portland, OR 97239  
[bernadetterodgers350@gmail.com](mailto:bernadetterodgers350@gmail.com)  
(971) 506-0561

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Cindy Tobiska](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Wednesday, October 11, 2023 6:10:06 PM

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Dear Climate DEQ,

Natural gas is a clean fuel, much cleaner than coal, but still gives us the 24 hour energy that we need to run our businesses, factories, air conditioning, etc. also, cooking with natural gas is superior to electric. We need dependable, affordable fuel sources for our country to prosper. Families are suffering from high energy, food and housing prices. We will soon have no middle class left if we keep going in this direction. None of the climate alarmists even seem to know that CO2 comprises only .04% of our atmosphere. that is only.4/10,000 ths, which is not very much!

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Cindy Tobiska  
55246 Morrison Rd  
Bandon, OR 97411  
ctobiska@yahoo.com

**From:** [Stephen Hocker \(hockersteve@gmail.com\) Sent You a Personal Message](mailto:hockersteve@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 11, 2023 6:20:05 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

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Thank you for the opportunity to provide comments.

Sincerely,

Stephen Hocker  
1373 SE 41st Street  
Lincoln City, OR 97367  
hockersteve@gmail.com  
(503) 590-4222

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Ian Williams \(kingscupchamps2012@gmail.com\)](mailto:kingscupchamps2012@gmail.com) Sent You a Personal Message  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 11, 2023 6:25:43 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

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Thank you for the opportunity to provide comments.

Sincerely,

Ian Williams  
380 West Buford Ave.  
Siletz, OR 97380  
[kingscupchamps2012@gmail.com](mailto:kingscupchamps2012@gmail.com)  
(987) 654-3210

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Sandra Elliott \(madamsandra@hotmail.com\) Sent You a Personal Message](mailto:madamsandra@hotmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 11, 2023 6:34:03 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Sandra Elliott  
7714 sw barnes rd  
Portland, OR 97225  
madamsandra@hotmail.com  
(503) 292-1384

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Heather Dale \(arydonis@hotmail.com\) Sent You a Personal Message](mailto:arydonis@hotmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 11, 2023 6:44:01 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Heather Dale  
26761 SW 45th Dr  
Wilsonville, OR 97070  
arydonis@hotmail.com  
(503) 682-7217

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Heather Dale \(arydonis@hotmail.com\) Sent You a Personal Message](mailto:arydonis@hotmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 11, 2023 6:47:11 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

Heather Dale  
26761 SW 45th Dr  
Wilsonville, OR 97070  
arydonis@hotmail.com  
(503) 682-7217

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Del Mccluskey \(del\\_mccluskey@yahoo.com\) Sent You a Personal Message](mailto:del_mccluskey@yahoo.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 11, 2023 6:48:25 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

Based on 30 years of work on climate change I've learned that offsets, while sounding good, are complete crap. If we're serious about transitioning to clean energy then we should help those industries that can switch to cleaner energy sources to do so. But fossil fuels need to be off the bargaining table over ate to be serious about meeting our climate protection goals.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

Del Mccluskey  
34431, NE wolcott Rd  
Corvallis, OR 97333  
[del\\_mccluskey@yahoo.com](mailto:del_mccluskey@yahoo.com)  
(703) 895-3571

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club.

If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [David Ewing \(davidmewing@outlook.com\) Sent You a Personal Message](mailto:davidmewing@outlook.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 11, 2023 6:59:53 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

David Ewing  
61084 Manhae Loop  
Bend, OR 97702  
davidmewing@outlook.com  
(773) 537-8920

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Ron Voss \(revoss1@frontier.com\) Sent You a Personal Message](mailto:revoss1@frontier.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 11, 2023 7:16:36 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

Ron Voss  
16076 SW Waxwing Way  
Beaverton, OR 97007  
revoss1@frontier.com  
(503) 522-7930

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Ramsay Weit \(polwonks@comcast.net\) Sent You a Personal Message](mailto:polwonks@comcast.net)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 11, 2023 7:20:36 PM

---

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Thank you for the opportunity to provide comments.

Sincerely,

Ramsay Weit  
, 3617 SW Texas St.  
Portland, OR 97219  
polwonks@comcast.net  
(503) 936-3306

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Paul Pearson \(taypearson96@gmail.com\) Sent You a Personal Message](mailto:taypearson96@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 11, 2023 7:28:41 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

Paul Pearson  
855 park st #15  
Ashland, OR 97520  
taypearson96@gmail.com  
(541) 960-4824

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Christine Reed \(orshadow@gmail.com\)](mailto:orshadow@gmail.com) Sent You a Personal Message  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 11, 2023 7:38:45 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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Sincerely,

Christine Reed  
12987 SW Gentry Lane  
Beaverton, OR 97005  
orshadow@gmail.com  
(919) 225-0550

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Nancy Pole-Wilhite \(nancy@terranovatour.com\) Sent You a Personal Message](mailto:nancy@terranovatour.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 11, 2023 7:41:46 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

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Thank you for the opportunity to provide comments.

Sincerely,

Nancy Pole-Wilhite  
2154 NW Aspen Ave  
Portland, OR 97210  
nancy@terranovatour.com  
(503) 296-7913

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Michael Flaningam \(mikeflanny@hotmail.com\) Sent You a Personal Message](mailto:mikeflanny@hotmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 11, 2023 7:51:59 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

Please use your power and influence to do what needs to be done to address the climate crisis. Our lives (not just our grandkids?) depend on such actions

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Michael Flaningam  
115 SW Gull Station  
Depoe Bay, OR 97341  
mikeflanny@hotmail.com  
(916) 712-3603

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Vicki Pedone \(vicki.pedone@csun.edu\) Sent You a Personal Message](mailto:vicki.pedone@csun.edu)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 11, 2023 8:18:41 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Vicki Pedone  
3285 Sumac Dr S  
Salem, OR 97302  
vicki.pedone@csun.edu  
(424) 395-8133

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Dena Turner \(denaturn62@gmail.com\) Sent You a Personal Message](mailto:denaturn62@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 11, 2023 8:28:15 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

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- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Dena Turner  
1122 SE 60th Ave  
Portland, OR 97215  
denaturn62@gmail.com  
(503) 953-3109

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Debra Smith \(rubydeb5@yahoo.com\) Sent You a Personal Message](mailto:rubydeb5@yahoo.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 11, 2023 8:40:20 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

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- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
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I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Debra Smith  
14561 Southeast Garland Lane  
Milwaukie, OR 97267  
rubydeb5@yahoo.com  
(503) 888-3035

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Debbie Fields \(fieldsfarmdeschutes@yahoo.com\) Sent You a Personal Message](mailto:fieldsfarmdeschutes@yahoo.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 11, 2023 8:48:17 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Debbie Fields  
61915 Pettigrew  
Bend, OR 97702  
fieldsfarmdeschutes@yahoo.com  
(541) 788-3932

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Loren Turvey](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Wednesday, October 11, 2023 8:50:11 PM

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Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Loren Turvey  
16157 S Sandalwood Rd  
Oregon City, OR 97045  
[turvey4864@gmail.com](mailto:turvey4864@gmail.com)

**From:** [Roy Wessbecher \(bretanet00@hotmail.com\) Sent You a Personal Message](mailto:bretanet00@hotmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 11, 2023 8:59:21 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Roy Wessbecher  
97952 Bubb Ln.  
Harbor, OR 97415  
[bretanet00@hotmail.com](mailto:bretanet00@hotmail.com)  
(541) 632-4004

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Jerry Jones](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Wednesday, October 11, 2023 9:00:07 PM

---

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Jerry Jones  
660 Sherman Dr  
The Dalles, OR 97058  
[jerrywjones45@gmail.com](mailto:jerrywjones45@gmail.com)

**From:** [Steph Spencer](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Wednesday, October 11, 2023 9:02:46 PM

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Dear 2023 DEQ Climate Rulemaking,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane (aka renewable natural gas (RNG)) used for CPP compliance to that which produces direct benefits for Oregonians – projects that reduce pollution in Oregon.
- 2) Disallowing hydrogen to be used for CPP compliance unless it is green electrolytic hydrogen (made from renewable energy sources like solar and wind). Why? Not all hydrogen is created equally. Where and how it is produced and used matters significantly when it comes to emissions reduction – if it's produced from fossil fuels out-of-state, it could be more polluting than even natural gas.
- 3) Strengthening emissions reduction requirements for new or expanded large industrial facilities in Oregon under the CPP's Best Available Emissions Reduction (BAER) program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they

benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,  
Steph Spencer  
113 nw minnesota  
Bend, OR 97703

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Wednesday, October 11, 2023 9:26:42 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
patrick vanderhout  
PO Box 1013  
Glenden Beach, OR 97388  
patrickvanderhout@mail.com

**From:** [James Boeckl](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Wednesday, October 11, 2023 9:50:23 PM

---

Dear Climate DEQ,

My wife and I prepared for retirement by investing in a residential solar electric system and a gas powered furnace. We hope to live out our days enjoying the benefits of these efficient, cost-saving energy sources. We hope we will not have to depend on heating our home with our wood stove because activists have lobbied to restrict natural gas production and a resulting higher cost.

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

James Boeckl  
1287 Orchid St  
Ashland, OR 97520  
7dcpilot@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Wednesday, October 11, 2023 10:00:51 PM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
John Quilter  
1450 Russet Drive  
Eugene, OR 97401  
[jquilter@peoplepc.com](mailto:jquilter@peoplepc.com)

**From:** [Joan Spiering \(joanspiering@gmail.com\) Sent You a Personal Message](mailto:joanspiering@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 11, 2023 10:08:38 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

Offsets are off the table as a climate solution! Offsets are a game with no real winners .

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Joan Spiering  
2009 NE 19th Ave.  
Portland, OR 97212  
joanspiering@gmail.com  
(503) 812-8498

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Kari Roper](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Wednesday, October 11, 2023 10:10:10 PM

---

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Kari Roper  
1680 Gwinn St E  
Monmouth, OR 97361  
[kari.roper.kr@gmail.com](mailto:kari.roper.kr@gmail.com)

**From:** [Steve Royal](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Wednesday, October 11, 2023 10:10:10 PM

---

You don't often get email from [stevedeeroyal@gmail.com](mailto:stevedeeroyal@gmail.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

However, I was disappointed to hear that the recent rule-making table did not include community input, and also that the results lacked in meeting the plan's original goals of reducing greenhouse gas emissions by 50%, providing meaningful investments to benefit Oregonians, and holding big polluters accountable.

Therefore, I am calling on the DEQ to adapt the rules for CPP implementation to focus on the original goals of:

- 1) Reducing greenhouse gas emissions and other air pollutants, maximizing public health benefits, and minimizing costs for consumers in environmental justice and other communities in Oregon.
- 2) Keeping economic and health benefits of the Community Climate Investment program in Oregon: investments should materially benefit Oregonians at the frontlines of pollution and the climate crisis, rather than paying for cheap offsets in other places.
- 3) Achieving real reduction of emissions by 50%, rather than allowing companies to invest in biomass-derived fuels such as "renewable natural gas" (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
- 4) Holding big polluters accountable to engage in science-based "best available emissions reductions" (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.
- 5) Returning the date for a "new source" of stationary pollution to December 31, 2021.

The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
Steve Royal  
64 NW 14 Place  
Gresham, OR 97030

**From:** [Cyan Solis-Sichel \(cyan.solissichel@gmail.com\) Sent You a Personal Message](mailto:cyan.solissichel@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 11, 2023 10:14:01 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

Please, please, please do what is best for the climate. I have small children and I grieve for the earth we are leaving them with. Please do that right thing!!

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Cyan Solis-Sichel  
2430 SE 79th Ave  
Portland, OR 97206  
[cyan.solissichel@gmail.com](mailto:cyan.solissichel@gmail.com)  
(503) 929-1443

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Pat Bowman \(pat.bowman@comcast.net\)](mailto:pat.bowman@comcast.net) Sent You a Personal Message  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 11, 2023 10:19:42 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

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- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Pat Bowman  
1021 NW Skyline Blvd.  
Portland, OR 97229  
pat.bowman@comcast.net  
(503) 332-6588

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Barbara Kerr \(kerrclifford@hotmail.com\) Sent You a Personal Message](mailto:kerrclifford@hotmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 11, 2023 10:36:01 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

We can't buy our way out of the climate crisis. Industries and businesses must stop polluting, period. It makes no sense for them to buy credit for reduction in pollution that is not their own.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

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- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Barbara Kerr  
1150 NE Faloma Rd.  
Portland, OR 97211  
kerrclifford@hotmail.com  
(503) 516-6464

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Karen Bain \(kbain@frontier.com\) Sent You a Personal Message](mailto:kbain@frontier.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 11, 2023 10:39:25 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

I have a neighbor who flouts the rules regarding backyard burning, so I know firsthand what air pollution is, is a small way. He has had nothing more than a letter from you all at DEQ. I imagine pollution from industry being many times worse. That's why this issue is important to me. Allowing some industries to buy offsets just doesn't cut it.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Karen Bain  
827 Bartlett St  
Silverton, OR 97381  
kbain@frontier.com  
(503) 873-8643

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club.

If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Doshia Burton](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Wednesday, October 11, 2023 11:10:12 PM

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Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Doshia Burton  
3774 NE Alameda St  
Portland, OR 97212  
doshiab@aol.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Wednesday, October 11, 2023 11:23:50 PM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Gordon Smith  
3813 NE 75th Ave  
Portland, OR 97213  
921trucker@gmail.com

**From:** [Ardis Letey \(aletey@peak.org\) Sent You a Personal Message](mailto:aletey@peak.org)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Wednesday, October 11, 2023 11:45:09 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Ardis Letey  
810 NW Kimo Ln  
Seal Rock, OR 97376  
aletey@peak.org  
(541) 563-8681

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Steve Royal](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Thursday, October 12, 2023 12:33:39 AM

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You don't often get email from [stevedeeroyal@gmail.com](mailto:stevedeeroyal@gmail.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

However, I was disappointed to hear that the recent rule-making table did not include community input, and also that the results lacked in meeting the plan's original goals of reducing greenhouse gas emissions by 50%, providing meaningful investments to benefit Oregonians, and holding big polluters accountable.

Therefore, I am calling on the DEQ to adapt the rules for CPP implementation to focus on the original goals of:

- 1) Reducing greenhouse gas emissions and other air pollutants, maximizing public health benefits, and minimizing costs for consumers in environmental justice and other communities in Oregon.
- 2) Keeping economic and health benefits of the Community Climate Investment program in Oregon: investments should materially benefit Oregonians at the frontlines of pollution and the climate crisis, rather than paying for cheap offsets in other places.
- 3) Achieving real reduction of emissions by 50%, rather than allowing companies to invest in biomass-derived fuels such as "renewable natural gas" (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
- 4) Holding big polluters accountable to engage in science-based "best available emissions reductions" (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.
- 5) Returning the date for a "new source" of stationary pollution to December 31, 2021.

The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
Steve Royal  
64 NW 14th Place  
Gresham, OR 97030

**From:** [Diane George \(dianegeorge4@gmail.com\) Sent You a Personal Message](mailto:dianegeorge4@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, October 12, 2023 3:39:23 AM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

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Thank you for the opportunity to provide comments.

Sincerely,

Diane George  
6286 NE Brighton St  
Hillsboro, OR 97124  
dianegeorge4@gmail.com  
(503) 615-8659

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [B. Hoyt \(bfhoyt@comcast.net\)](mailto:bfhoyt@comcast.net) Sent You a Personal Message  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, October 12, 2023 3:55:34 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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Thank you for the opportunity to provide comments.

Sincerely,

B. Hoyt  
1630 Ne Broadway  
Portland, OR 97232  
bfhoyt@comcast.net  
(506) 282-1126

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Jennifer Maffei \(jmmaffe45@gmail.com\) Sent You a Personal Message](mailto:jmmaffe45@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, October 12, 2023 5:03:59 AM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

Stop allowing the oil and gas industry to destroy our future, make our populations sick, and contribute to species collapse, catastrophic storms, and toxic air. We need a new energy future NOW. I reject the industry's effort to avoid regulation. DEQ needs to hold polluters accountable.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Jennifer Maffei  
2718 SE 30th Avenue, Apt B  
Portland, OR 97202  
jmmaffe45@gmail.com  
(503) 548-4790

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415)

977-5673.

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Thursday, October 12, 2023 5:18:55 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Amanda Jarvis  
4354 Berry Ln  
Eugene, OR 97404  
a2jarvis@yahoo.com

**From:** [Christie Zerfing \(christiezerfing@gmail.com\) Sent You a Personal Message](mailto:christiezerfing@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, October 12, 2023 5:28:14 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Christie Zerfing  
344 S 7th St  
Carlton, OR 97111  
[christiezerfing@gmail.com](mailto:christiezerfing@gmail.com)  
(503) 320-2679

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Rob Groscup](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Thursday, October 12, 2023 5:50:12 AM

---

Dear Climate DEQ,

Energy isn't a one size fits all. Before moving here I converted my prior home from oil heat to NG making it more efficient and cleaner. NG is already more efficient than other forms of energy. Keep choice and costs low.

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Rob Groscup  
4055 Mercantile Dr  
Lake Oswego, OR 97035  
[groscup@gmail.com](mailto:groscup@gmail.com)

**From:** [Heather Watts \(twilightmoongoddess@gmail.com\) Sent You a Personal Message](mailto:twilightmoongoddess@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, October 12, 2023 6:39:28 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
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I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Heather Watts  
5568 SE Flavel Drive  
Portland, OR 97206  
twilightmoongoddess@gmail.com  
(503) 754-0923

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Thursday, October 12, 2023 6:47:14 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Bradley Vandehey  
5348 Amberwood Ct  
Lake Oswego, OR 97035  
[bjvandehey@gmail.com](mailto:bjvandehey@gmail.com)

**From:** [Debra Hawash](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Thursday, October 12, 2023 6:50:08 AM

---

Dear Climate DEQ,

I cannot afford expensive electricity. My house is heated with Natural Gas fireplaces.

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Debra Hawash  
625 SW 130th Ave  
Beaverton, OR 97005  
djmeve@comcast.net

**From:** [Karen Martin \(kgmartin8@gmail.com\) Sent You a Personal Message](mailto:kgmartin8@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, October 12, 2023 6:53:23 AM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Karen Martin  
2804 NE 37th Ave  
Portland, OR 97212  
kgmartin8@gmail.com  
(510) 517-1046

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Thursday, October 12, 2023 7:01:44 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Diana Blashishen  
722 Ne 110th AVE  
Portland, OR 97220  
[dianka\\_ddh@live.com](mailto:dianka_ddh@live.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Thursday, October 12, 2023 7:04:15 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Mikhail Kazak  
734 Ne 110th AVE  
Portland , OR 97220  
Raisakazak@yahoo.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Thursday, October 12, 2023 7:06:19 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Raisa Kazak  
734 Northeast 110th Avenue  
Portland, OR 97220  
[raisakazak@yahoo.com](mailto:raisakazak@yahoo.com)

**From:** [Sally Noack \(rfoxcreek@peak.org\) Sent You a Personal Message](mailto:rfoxcreek@peak.org)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, October 12, 2023 7:20:54 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Sally Noack  
POBox 923  
Waldport, OR 97394  
rfoxcreek@peak.org  
(541) 563-6636

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Thursday, October 12, 2023 7:22:57 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Frank Gecina  
1305 NW 11Th St  
Corvallis, OR 97330  
[frankgecina@gmail.com](mailto:frankgecina@gmail.com)

**From:** [Flavia Franco](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, October 12, 2023 7:24:41 AM

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You don't often get email from flavita10s@gmail.com. [Learn why this is important](#)

Department of Environmental Quality,

It is very important to me to be submitting my comment on DEQ's 2023 climate rulemaking. The Climate Protection Program (CCP) is Oregon's best chance to reach its climate goals, which it must do - **bottomline**. It:

- Requires oil companies and gas utilities\* to cut emissions 50% by 2035 & 90% by 2050;
- Regulates major industrial facilities (BAER)
- Invests in environmental justice communities (CCI program)

As the only existing state regulation on major industrial emitters, it is vital that the CPP remains a very effective regulation, and that it works to ensure science-based emissions reductions from existing stationary sources of greenhouse gas emissions and deter development of new stationary sources in Oregon.

This rulemaking – if done well – could help to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, the proposed rule changes / amendments amount to the creation of loopholes, and therefore the power and integrity of the program would be greatly diminished and undermined, and they would render the program to be not much more than green washing tactics. Not only would these changes weaken Oregon's ability to reach its aggressive climate goals, they would also decrease the intended economic benefits for Oregon that would derive from the Community Climate Investment (CCI) program. These vital

benefits are necessary to help Oregon make the difficult transition away from dependence on sources of greenhouse gas emissions. We do not have another decade to waste on green washing tactics. The program was adopted with overwhelming public support following an extensive 18 month rulemaking and stakeholder engagement process.

Specifically, I am concerned that DEQ's current proposed rule changes would allow regulated gas utilities to rely on out-of-state biomethane investments, and they would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane or hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon;

**Please improve compliance requirements to disallow using book and claim accounting for hydrogen applications and keep investments in state. And please maintain strong reporting requirements - including lifecycle emissions - for all hydrogen production.**

and

- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

**We cannot continue to enable the development of new sources of GHG emissions or expansion of existing sources.**

**That would fly in the face of the CPP's stated equity and climate goals. Any new stationary source or any**

**proposed modification that has the potential to emit more greenhouse gases in any quantity should complete a BAER assessment prior to construction.**

Thank You.

Flavia Franco  
[flavita10s@gmail.com](mailto:flavita10s@gmail.com)

541-625-4006 landline

408-242-9933 cell

member of Southern Oregon Food Solutions (SOFS)

To have a more self-sufficient, sustainable community, and to minimize food waste that causes greenhouse gas emissions, the SOFS mission is to educate and inspire action for food production, usage, and disposal.

**From:** [Derek Gendvil](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Thursday, October 12, 2023 7:56:52 AM

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You don't often get email from [dgendvil@gmail.com](mailto:dgendvil@gmail.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

However, I was disappointed to hear that the recent rule-making table did not include community input, and also that the results lacked in meeting the plan's original goals of reducing greenhouse gas emissions by 50%, providing meaningful investments to benefit Oregonians, and holding big polluters accountable.

Therefore, I am calling on the DEQ to adapt the rules for CPP implementation to focus on the original goals of:

- 1) Reducing greenhouse gas emissions and other air pollutants, maximizing public health benefits, and minimizing costs for consumers in environmental justice and other communities in Oregon.
- 2) Keeping economic and health benefits of the Community Climate Investment program in Oregon: investments should materially benefit Oregonians at the frontlines of pollution and the climate crisis, rather than paying for cheap offsets in other places.
- 3) Achieving real reduction of emissions by 50%, rather than allowing companies to invest in biomass-derived fuels such as "renewable natural gas" (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
- 4) Holding big polluters accountable to engage in science-based "best available emissions reductions" (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.
- 5) Returning the date for a "new source" of stationary pollution to December 31, 2021.

The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
Derek Gendvil  
9030 W Sahara Ave PMB 360  
Las Vegas, NV 89117

**From:** [Victoria \("V"\) Eells \(dirtroadiva@gmail.com\)](mailto:Victoria%20(V)%20Eells%20(dirtroadiva@gmail.com)) Sent You a Personal Message  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, October 12, 2023 7:58:45 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Victoria ("V") Eells  
28049 Hunter Creek Road, P.O. Box 693  
Gold Beach, OR 97444  
dirtroadiva@gmail.com  
(541) 441-7161

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [ELIZABETH LARSEN \(elizabeth.larsen56@gmail.com\)](mailto:elizabeth.larsen56@gmail.com) Sent You a Personal Message  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, October 12, 2023 8:09:19 AM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

To whomever cares,

If utilities pay to keep polluting, they will pass on the cost to consumers who will also receive their pollution. Stop the loophole.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

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- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

ELIZABETH LARSEN  
1210 NE 152nd Ave.  
Portland, OR 97230  
[elizabeth.larsen56@gmail.com](mailto:elizabeth.larsen56@gmail.com)  
(503) 309-4209

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977-5673.

**From:** [Barbara Bowers \(vividme2@gmail.com\) Sent You a Personal Message](mailto:Barbara.Bowers@vividme2@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, October 12, 2023 8:24:22 AM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

Extreme weather as predicted indicates to me we no longer can accept carbon offsets. Every business needs to clean up their production methods to help achieve a livable environment.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Barbara Bowers  
6388 SW Capitol Hwy, Apt 20  
Portland, OR 97239  
vividme2@gmail.com  
(209) 948-2827

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Thursday, October 12, 2023 8:29:06 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Sandra Hamilton  
13235 SW 31st Street  
Beaverton, OR 97008  
[sandra.l.hamilton@gmail.com](mailto:sandra.l.hamilton@gmail.com)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Thursday, October 12, 2023 8:45:08 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Laura Merrill  
2420 SW 76th Avenue  
Portland, OR 97225  
Merril.Laura@gmail.com

**From:** [Craig Fleishman](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Thursday, October 12, 2023 9:10:07 AM

---

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Craig Fleishman  
5406 SW Baird St  
Portland, OR 97219  
Cafleishman@msn.com

**From:** [Robin Anderson \(corbinj@hotmail.com\) Sent You a Personal Message](mailto:corbinj@hotmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, October 12, 2023 9:13:18 AM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

Please take action to protect our environment!! Loopholes must be eliminated!!

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Robin Anderson  
1802 Northeast Fairview Avenue, Apt BP  
Grants Pass, OR 97526  
corbinj@hotmail.com  
(303) 437-2781

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [William Musser \(wmusseriv@icloud.com\) Sent You a Personal Message](mailto:wmusseriv@icloud.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, October 12, 2023 9:15:59 AM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

William Musser  
3225 NE 29th Ave  
Portland, OR 97212  
wmusseriv@icloud.com  
(303) 549-0938

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [joe frascone \(justjoejj@msn.com\) Sent You a Personal Message](mailto:justjoejj@msn.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, October 12, 2023 9:20:39 AM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

joe frascone  
997 SE Academy St  
Dallas, OR 97338  
justjoejj@msn.com  
(503) 623-6381

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**From:** [Mark Levy \(mark@marklevymusic.com\) Sent You a Personal Message](mailto:mark@marklevymusic.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, October 12, 2023 9:24:16 AM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

It is well past time we demand that industrial polluters cut back and stop fueling climate change, which is devastating our planet. Please call for tighter restrictions and roll out of alternative energy sources that are non-polluting.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Mark Levy  
1600 RHODODENDRON DR., Space 176  
Florence, OR 97439  
mark@marklevymusic.com  
(831) 419-6275

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977-5673.

**From:** [Penney Reed \(hateu3241@gmail.com\) Sent You a Personal Message](mailto:hateu3241@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, October 12, 2023 9:35:38 AM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Penney Reed  
81667 Reavis Ln  
Enterprise, OR 97828  
hateu3241@gmail.com  
(580) 504-3799

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Lori Arce-torres](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Cc:** [NW Natural - Cindi Fostveit](#)  
**Subject:** Climate Rulemaking Letter  
**Date:** Thursday, October 12, 2023 9:39:26 AM  
**Attachments:** [Outlook-pebrc3lk.bmp](#)  
[0231\\_001.pdf](#)

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Please find the 2023 Climate Rulemaking Comments from the Lincoln City Chamber.

Thank you,

*Lori Arce-Torres*  
*Lincoln City Chamber Executive Director*  
*541-994-3070*  
*4039 NW Logan Road, Lincoln City, Oregon*  
*director@lcchamber.com*  
Visit our website  
[lcchamber.com](#)



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**From:** LC Chamber <infolcchamber@gmail.com>  
**Sent:** Thursday, October 12, 2023 9:30 AM  
**To:** Lori Arce-torres <director@lcchamber.com>  
**Subject:** Attached Image

**From:** [Pamela Miller](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, October 12, 2023 10:02:21 AM

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You don't often get email from pamz@pamelazmiller.com. [Learn why this is important](#)

Dear 2023 DEQ Climate Rulemaking,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane (aka renewable natural gas (RNG)) used for CPP compliance to that which produces direct benefits for Oregonians – projects that reduce pollution in Oregon.
- 2) Disallowing hydrogen to be used for CPP compliance unless it is green electrolytic hydrogen (made from renewable energy sources like solar and wind). Why? Not all hydrogen is created equally. Where and how it is produced and used matters significantly when it comes to emissions reduction – if it's produced from fossil fuels out-of-state, it could be more polluting than even natural gas.
- 3) Strengthening emissions reduction requirements for new or expanded large industrial facilities in Oregon under the CPP's Best Available Emissions Reduction (BAER) program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they

benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

TX

Sincerely,  
Pamela Miller  
6230 Thomas Court  
Tolar, TX 76476

**From:** [Bernadette Rodgers](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Cc:** [Bernadette Rodgers](#)  
**Subject:** Comments on DEQ Climate 2023 Rulemaking  
**Date:** Thursday, October 12, 2023 10:06:27 AM

---

You don't often get email from bernadetterodgers350@gmail.com. [Learn why this is important](#)

Hello,

Given the short timeframe global scientists say we have to reduce emissions in half by 2025, it is imperative for all of our health and safety, that these rulings be as strong as possible in line with the goals of the state Climate Protection Plan, instead of fostering business-as-usual or false solutions. I'm disappointed then, to see that the DEQ is following a safe "status quo" path, rather than seizing this opportunity-- and accepting your moral responsibility-- to take the strongest possible action.

Here are my specific requests and recommendations:

1. Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon. Biomass derived fuels should not be allowed exemptions.
2. Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon. Unfortunately, since the adoption of the final CPP rules in 2021, increasing emissions from Oregon's industrial sector has become a reality when we should be holding polluters responsible for decreasing emissions.
3. Maintaining protective restrictions on methane and biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from anthropogenic carbon sources does not comply with the CPP.
4. Including export and transport facilities in emission reduction and reporting standards. Export facilities should have to list their final destinations. While they may utilize devices to reduce emissions during pumping phases, the open venting of railroad cars to reduce sparking must also be taken under consideration as should potential leakage during storage, transportation, and transfers. Any substantive change of site use should require a new Air Contaminant Discharge Permit (ACDP) or Title V permitting instead of being allowed to operate under old permits. Export facilities add to overall global emissions which affect us all in terms of climate chaos.
5. Biofuels and other so-called renewable fuels should not only be reporting on feedstocks and production methodologies, but also on the fuels used for hydrogenation, esterification or other processing to adequately access the true Carbon intensity numbers. Reporting should also include the land change values necessary to determine what other crops the land could have produced for human consumption as well as associated transportation and fertilizer emissions, and the like for a full picture. Carbon intensity modeling is problematic in numerous ways which is why actual monitoring data and health

assessments are preferable.

Thank you for considering these changes, and for doing the right thing by future generations. DEQ is in a position of great power, and great responsibility-- please seize it! I appreciate your service.

Bernadette Rodgers  
Portland, OR, 97239  
971-506-0561

**From:** [Cathy Steere](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Thursday, October 12, 2023 10:20:26 AM

---

Dear Climate DEQ,

Please keep the decarbonization options and keep the utility bills as low as possible.

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Cathy Steere  
3870 S Immonen Rd  
Lincoln City, OR 97367  
cak5050@yahoo.com

**From:** [Tara Kreft](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Thursday, October 12, 2023 10:21:49 AM

---

You don't often get email from tara.kreft@gmail.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

However, I was disappointed to hear that the recent rule-making table did not include community input, and also that the results lacked in meeting the plan's original goals of reducing greenhouse gas emissions by 50%, providing meaningful investments to benefit Oregonians, and holding big polluters accountable.

Therefore, I am calling on the DEQ to adapt the rules for CPP implementation to focus on the original goals of:

- 1) Reducing greenhouse gas emissions and other air pollutants, maximizing public health benefits, and minimizing costs for consumers in environmental justice and other communities in Oregon.
- 2) Keeping economic and health benefits of the Community Climate Investment program in Oregon: investments should materially benefit Oregonians at the frontlines of pollution and the climate crisis, rather than paying for cheap offsets in other places.
- 3) Achieving real reduction of emissions by 50%, rather than allowing companies to invest in biomass-derived fuels such as "renewable natural gas" (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
- 4) Holding big polluters accountable to engage in science-based "best available emissions reductions" (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.
- 5) Returning the date for a "new source" of stationary pollution to December 31, 2021.

The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
Tara Kreft  
7835 SE Grant St  
Portland, OR 97215

**From:** [Shawn Looney](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Climate rule making  
**Date:** Thursday, October 12, 2023 10:24:44 AM

---

You don't often get email from looneysters@gmail.com. [Learn why this is important](#)

Hello,

It's very disappointing to see that the DEQ is following a safe "status quo" path, rather than seizing this opportunity-- and accepting your moral responsibility-- to take the strongest possible action. Given the short timeframe global scientists say we have to reduce emissions in half by 2025, it is imperative for all of our health and safety, that these rulings be as strong as possible in line with the goals of the state Climate Protection Plan.

Here are my specific requests and recommendations:

1. Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon. Biomass derived fuels should not be allowed exemptions.
2. Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon. Unfortunately, since the adoption of the final CPP rules in 2021, increasing emissions from Oregon's industrial sector has become a reality when we should be holding polluters responsible for decreasing emissions.
3. Maintaining protective restrictions on methane and biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from anthropogenic carbon sources does not comply with the CPP.
4. Including export and transport facilities in emission reduction and reporting standards. Export facilities should have to list their final destinations. While they may utilize devices to reduce emissions during pumping phases, the open venting of railroad cars to reduce sparking must also be taken under consideration as should potential leakage during storage, transportation, and transfers. Any substantive change of site use should require a new Air Contaminant Discharge Permit (ACDP) or Title V permitting instead of being allowed to operate under old permits. Export facilities add to overall global emissions which affect us all in terms of climate chaos.
5. Biofuels and other so-called renewable fuels should not only be reporting on feedstocks and production methodologies, but also on the fuels used for hydrogenation, esterification or other processing to adequately access the true Carbon intensity numbers. Reporting should also include the land change values necessary to determine what other crops the land could have produced for human consumption as well as associated transportation and fertilizer emissions, and the like for a full picture. Carbon intensity modeling is problematic in numerous ways which is why actual monitoring data and health assessments are preferable.

Thank you for considering these changes, and for doing the right thing by future generations. DEQ is in a position of great power, and great responsibility-- please seize it!

Shawn Looney  
Linnton

**From:** [Bruce Endicott](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Thursday, October 12, 2023 10:30:13 AM

---

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Bruce Endicott  
2706 NW Canyon Dr  
Redmond, OR 97756  
[bruceendicott@gmail.com](mailto:bruceendicott@gmail.com)

**From:** [Patricia Endicott](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Thursday, October 12, 2023 10:30:18 AM

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Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Patricia Endicott  
2706 NW Canyon Dr  
Redmond, OR 97756  
[trishendicott@gmail.com](mailto:trishendicott@gmail.com)

**From:** [Carla Williams](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Thursday, October 12, 2023 11:00:12 AM

---

Dear Climate DEQ,

We need options for our energy needs. We don't want to rely only on electricity.

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Carla Williams  
1490 Jason Lee Ave  
Cottage Grove, OR 97424  
[towerycarla@hotmail.com](mailto:towerycarla@hotmail.com)

**From:** [Steven Jackson \(stevencolinjackson@gmail.com\) Sent You a Personal Message](mailto:stevencolinjackson@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, October 12, 2023 11:12:13 AM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Steven Jackson  
17216 SE Royer Road  
Damascus, OR 97089  
stevencolinjackson@gmail.com  
(503) 658-0362

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Maleek Mckenzie \(maleekmckenzie@gmail.com\) Sent You a Personal Message](mailto:Maleek Mckenzie (maleekmckenzie@gmail.com) Sent You a Personal Message)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, October 12, 2023 11:13:03 AM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Maleek Mckenzie  
9230 NE Rockspring St  
Hillsboro, OR 97124  
maleekmckenzie@gmail.com  
(917) 520-8652

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Thursday, October 12, 2023 11:17:59 AM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
ANCUTA BEC  
2229 SE 113TH AVE  
PORTLAND, OR 97216  
ancutabec@yahoo.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Thursday, October 12, 2023 11:19:53 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
VERONICA BEC  
2229 SE 113TH AVE  
PORTLAND, OR 97216  
vbec0251@comcast.net

**From:** [Laurie King](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Re: DEQ 2023 Climate rulemaking  
**Date:** Thursday, October 12, 2023 11:21:29 AM

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You don't often get email from [laurie70.king@gmail.com](mailto:laurie70.king@gmail.com). [Learn why this is important](#)

Hello Oregon DEQ,

In all respect, I too often find that the DEQ accommodates industry over the environment and people. I wish as strongly as I can that you take courageous action now. I live in St. John's right across the river from the CEI Hub and near other industry. Our community is not protected from air pollution by the DEQ. We know that. It needs to change.

Given the short timeframe global scientists say we have to reduce emissions in half by 2025, it is imperative for all of our health and safety, that these rulings be as strong as possible in line with the goals of the state Climate Protection Plan, instead of fostering business-as-usual or false solutions. I'm disappointed then, to see that the DEQ is following a safe "status quo" path, rather than seizing this opportunity-- and accepting your moral responsibility-- to take the strongest possible action.

Here are my specific requests and recommendations:

1. Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon. Biomass derived fuels should not be allowed exemptions.
2. Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon. Unfortunately, since the adoption of the final CPP rules in 2021, increasing emissions from Oregon's industrial sector has become a reality when we should be holding polluters responsible for decreasing emissions.
3. Maintaining protective restrictions on methane and biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from anthropogenic carbon sources does not comply with the CPP.
4. Including export and transport facilities in emission reduction and reporting standards. Export facilities should have to list their final destinations. While they may utilize devices to reduce emissions during pumping phases, the open venting of railroad cars to reduce sparking must also be taken under consideration as should potential leakage during storage, transportation, and transfers. Any substantive change of site use should require a new Air Contaminant Discharge Permit (ACDP) or Title V permitting instead of being allowed to operate under old permits. Export facilities add to overall global emissions which affect us all in terms of climate chaos.
5. Biofuels and other so-called renewable fuels should not only be reporting on feedstocks and production methodologies, but also on the fuels used for

hydrogenation, esterification or other processing to adequately access the true Carbon intensity numbers. Reporting should also include the land change values necessary to determine what other crops the land could have produced for human consumption as well as associated transportation and fertilizer emissions, and the like for a full picture. Carbon intensity modeling is problematic in numerous ways which is why actual monitoring data and health assessments are preferable.

Thank you for considering these changes, and for doing the right thing by future generations. DEQ is in a position of great power, and great responsibility-- please seize it! I appreciate your service.

Laurie King  
8716 N. Edison St. Portland 97203

On Thu, Oct 12, 2023 at 11:18 AM Laurie King <[laurie70.king@gmail.com](mailto:laurie70.king@gmail.com)> wrote:

Hello Oregon DEQ,

In all respect, I too often find that the DEQ accomodates industry over the environment and people. I wish as strongly as I can that you take courageous action now. I live in St. John's right across the river from the CEI Hub and near other industry. Our community is not proteced from air pollution by the DEQ. We know that. It needs to change.

Given the short timeframe global scientists say we have to reduce emissions in half by 2025, it is imperative for all of our health and safety, that these rulings be as strong as possible in line with the goals of the state Climate Protection Plan, instead of fostering business-as-usual or false solutions. I'm disappointed then, to see that the DEQ is following a safe "status quo" path, rather than seizing this opportunity-- and accepting your moral responsibility-- to take the strongest possible action.

Here are my specific requests and recommendations:

1. Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon. Biomass derived fuels should not be allowed exemptions.
2. Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon. Unfortunately, since the adoption of the final CPP rules in 2021, increasing emissions from Oregon's industrial sector has become a reality when we should be holding polluters responsible for decreasing emissions.
3. Maintaining protective restrictions on methane and biomethane accounting in the current rules where they exist, including notably, that synthetic

methane derived from anthropogenic carbon sources does not comply with the CPP.

4. Including export and transport facilities in emission reduction and reporting standards. Export facilities should have to list their final destinations. While they may utilize devices to reduce emissions during pumping phases, the open venting of railroad cars to reduce sparking must also be taken under consideration as should potential leakage during storage, transportation, and transfers. Any substantive change of site use should require a new Air Contaminant Discharge Permit (ACDP) or Title V permitting instead of being allowed to operate under old permits. Export facilities add to overall global emissions which affect us all in terms of climate chaos.
5. Biofuels and other so-called renewable fuels should not only be reporting on feedstocks and production methodologies, but also on the fuels used for hydrogenation, esterification or other processing to adequately assess the true Carbon intensity numbers. Reporting should also include the land change values necessary to determine what other crops the land could have produced for human consumption as well as associated transportation and fertilizer emissions, and the like for a full picture. Carbon intensity modeling is problematic in numerous ways which is why actual monitoring data and health assessments are preferable.

Thank you for considering these changes, and for doing the right thing by future generations. DEQ is in a position of great power, and great responsibility-- please seize it! I appreciate your service.

**From:** [Barbara Ford](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Thursday, October 12, 2023 11:25:32 AM

---

You don't often get email from [barbara.e.ford@gmail.com](mailto:barbara.e.ford@gmail.com). [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

However, I was disappointed to hear that the recent rule-making table did not include community input, and also that the results lacked in meeting the plan's original goals of reducing greenhouse gas emissions by 50%, providing meaningful investments to benefit Oregonians, and holding big polluters accountable.

Therefore, I am calling on the DEQ to adapt the rules for CPP implementation to focus on the original goals of:

- 1) Reducing greenhouse gas emissions and other air pollutants, maximizing public health benefits, and minimizing costs for consumers in environmental justice and other communities in Oregon.
- 2) Keeping economic and health benefits of the Community Climate Investment program in Oregon: investments should materially benefit Oregonians at the frontlines of pollution and the climate crisis, rather than paying for cheap offsets in other places.
- 3) Achieving real reduction of emissions by 50%, rather than allowing companies to invest in biomass-derived fuels such as "renewable natural gas" (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
- 4) Holding big polluters accountable to engage in science-based "best available emissions reductions" (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.
- 5) Returning the date for a "new source" of stationary pollution to December 31, 2021.

The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
Barbara Ford  
7100 SE Harrison Ct  
Portland, OR 97215

**From:** [George Autry](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, October 12, 2023 11:37:28 AM

---

You don't often get email from old60gunner@gmail.com. [Learn why this is important](#)

Dear 2023 DEQ Climate Rulemaking,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane (aka renewable natural gas (RNG)) used for CPP compliance to that which produces direct benefits for Oregonians – projects that reduce pollution in Oregon.
- 2) Disallowing hydrogen to be used for CPP compliance unless it is green electrolytic hydrogen (made from renewable energy sources like solar and wind). Why? Not all hydrogen is created equally. Where and how it is produced and used matters significantly when it comes to emissions reduction – if it's produced from fossil fuels out-of-state, it could be more polluting than even natural gas.
- 3) Strengthening emissions reduction requirements for new or expanded large industrial facilities in Oregon under the CPP's Best Available Emissions Reduction (BAER) program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they

benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,  
George Autry  
PO Box 397, 54432 McKenzie Hwy #19  
BLUE RIVER, OR 97413

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Thursday, October 12, 2023 11:40:52 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
George Larson  
414 12th Ave SW  
Albany, OR 97321  
larsg1f@gmail.com

**From:** [Ira White](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Thursday, October 12, 2023 11:50:09 AM

---

Dear Climate DEQ,

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Ira White  
103 E Blakely Ave  
Brownsville, OR 97327  
[irawhite@hotmail.com](mailto:irawhite@hotmail.com)

**From:** [john paisley](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking at DEQ  
**Date:** Thursday, October 12, 2023 11:56:04 AM

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[You don't often get email from bekilet@hevanet.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

To Whom it May Concern

As a citizen who breathes the air, drinks the water, and hopes that our state will thrive in a healthy environment I am deeply concerned that DEQ must protect these vital resources. We all know that certain business practices produce toxic substances. It is in all of our best interests to deal with these in a way that does not harm our health. Whatever the process, the result must provide us with that healthy environment.

As you know, more and more Oregon residents are concerned enough to fight for a clean environment. We will stand up and denounce anyone who stands in the way. I ask you please find the will and the way to be an asset, not a liability.

Thanks,

John Paisley,

Portland, OR

503 839 0199

**From:** [Michael Heumann](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Comments on the DEQ Climate 2023 Rulemaking  
**Date:** Thursday, October 12, 2023 11:57:23 AM

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You don't often get email from heumanncycle@gmail.com. [Learn why this is important](#)

DEQ: Thank you for the opportunity to provide comments on this critically important issue that DEQ is considering. I believe that it is imperative for all of our health and safety, that these rulings be as strong as possible and remain in line with the goals of the state Climate Protection Plan. Given the extremely short timeframe global scientists say we have to reduce emissions in half by 2025, it is important that we immediately stop fostering business-as-usual or false solutions. It is disappointing to see that the DEQ is continuing to follow a safe "status quo" path, rather than seizing this opportunity-- and accepting your moral responsibility-- to take the strongest possible action. These actions are critical to the health of Oregonians and the animals and plants that are part of our fragile ecosystems.

Here are some specific requests and recommendations:

- <!--[if !supportLists]-->1. <!--[endif]-->Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon. **Biomass derived fuels should not be allowed exemptions.**
- <!--[if !supportLists]-->2. <!--[endif]-->Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon. Unfortunately, since the adoption of the final CPP rules in 2021, increasing emissions from Oregon's industrial sector has become a reality when we should be holding polluters responsible for decreasing emissions.
- <!--[if !supportLists]-->3. <!--[endif]-->Maintaining protective restrictions on methane and biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from anthropogenic carbon sources does not comply with the CPP.
- <!--[if !supportLists]-->4. <!--[endif]-->**Including export and transport facilities in emission reduction and reporting standards.** Export facilities should have to list their final destinations. While they may utilize devices to reduce emissions during pumping phases, the open venting of railroad cars to reduce sparking must also be taken under consideration as should potential leakage during storage, transportation, and transfers. Any substantive change of site use should require a new Air Contaminant Discharge Permit (ACDP) or Title V permitting instead of being allowed to operate under old permits. Export facilities add to overall global emissions which affect us all in terms of climate chaos.
- <!--[if !supportLists]-->5. <!--[endif]-->**Biofuels and other so-called renewable fuels should not only be reporting on feedstocks and production methodologies, but also on the fuels used for hydrogenation, esterification or other processing to adequately access the true Carbon intensity numbers.** Reporting should also

include the land change values necessary to determine what other crops the land could have produced for human consumption as well as associated transportation and fertilizer emissions, and the like for a full picture. Carbon intensity modeling is problematic in numerous ways which is why actual monitoring data and health assessments are preferable.

I urge you to make these changes, and help insure a healthier environment for all life in Oregon. Thank you for doing the right thing by future generations. DEQ is in a position of great power, and great responsibility -- please seize it! I appreciate your service.

Respectfully submitted by:

Michael Heumann, MPH, MA  
Portland, OR 97218

**From:** [Mary Lyon \(maryglyon@yahoo.com\) Sent You a Personal Message](mailto:Mary Lyon (maryglyon@yahoo.com) Sent You a Personal Message)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, October 12, 2023 12:04:51 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

We only have one planet. If we burn it up, ALL OF US will be affected. Where do we live, then?

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Mary Lyon  
999 Oxford Drive  
Lake Oswego, OR 97034  
maryglyon@yahoo.com  
(310) 903-7536

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Mary Lyon \(maryglyon@yahoo.com\) Sent You a Personal Message](mailto:Mary Lyon (maryglyon@yahoo.com) Sent You a Personal Message)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, October 12, 2023 12:06:20 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

We only have one planet. If we burn it up, ALL OF US will be affected. Where do we live, then?

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

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- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Mary Lyon  
999 Oxford Drive  
Lake Oswego, OR 97034  
maryglyon@yahoo.com  
(310) 903-7536

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [dwayne hedstrom](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Date:** Thursday, October 12, 2023 12:07:07 PM

---

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greetings,

i am writing from the cully neighborhood in portland where the out of state owned and out of compliance glass recycling facility has been spewing toxins into the air for years to request that the deq rulemaking committee consider establishing rules that break with the business as usual approach that it was established to support. i am asking that you consider a planet and people approach that prioritizes clean air and water

thanks and best of luck in dealing with the power of the \$

dwayne hedstrom  
4823 ne 72nd ave  
portland or 97218

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Thursday, October 12, 2023 12:07:10 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Dennis Broderick  
4327 SE 63rd Ave  
Hillsboro, OR 97123  
[janetanddennis@gmail.com](mailto:janetanddennis@gmail.com)

**From:** [Martin Robbins \(microbbins72@gmail.com\) Sent You a Personal Message](mailto:microbbins72@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, October 12, 2023 12:16:33 PM

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Dear Oregon Department of Environmental Quality - 2023 CCP,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Martin Robbins  
36373 River Point Drive  
Astoria, OR 97103  
microbbins72@gmail.com  
(541) 961-2775

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Jennifer Cho Kain](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Comments on DEQ Climate 2023 Rulemaking  
**Date:** Thursday, October 12, 2023 12:28:43 PM

---

You don't often get email from [jchokain@gmail.com](mailto:jchokain@gmail.com). [Learn why this is important](#)

Dear DEQ Officer:

Given the short timeframe global scientists say we have to reduce emissions in half by 2025, it is imperative for all of our health and safety, that these rulings be as strong as possible in line with the goals of the state Climate Protection Plan, instead of fostering business-as-usual or false solutions. I am disappointed then, to see that the DEQ is following a safe "status quo" path, rather than seizing this opportunity-- and accepting your moral responsibility-- to take the strongest possible action.

Here are my specific requests and recommendations:

1. Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon. Biomass derived fuels should not be allowed exemptions.
2. Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon. Unfortunately, since the adoption of the final CPP rules in 2021, increasing emissions from Oregon's industrial sector has become a reality when we should be holding polluters responsible for decreasing emissions.
3. Maintaining protective restrictions on methane and biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from anthropogenic carbon sources does not comply with the CPP.
4. Including export and transport facilities in emission reduction and reporting standards. Export facilities should have to list their final destinations. While they may utilize devices to reduce emissions during pumping phases, the open venting of railroad cars to reduce sparking must also be taken under consideration as should potential leakage during storage, transportation, and transfers. Any substantive change of site use should require a new Air Contaminant Discharge Permit (ACDP) or Title V permitting instead of being allowed to operate under old permits. Export facilities add to overall global emissions which affect us all in terms of climate chaos.
5. Biofuels and other so-called renewable fuels should not only be reporting on feedstocks and production methodologies, but also on the fuels used for hydrogenation, esterification or other processing to adequately access the true Carbon intensity numbers. Reporting should also include the land change values necessary to determine what other crops the land could have produced for human consumption as well as associated transportation and fertilizer emissions, and the like for a full picture. Carbon intensity modeling is problematic in numerous ways which is why actual monitoring data and health assessments are preferable.

Thank you for considering these changes, and for doing the right thing by future generations. DEQ is in a position of great power, and great responsibility-- please seize it! I appreciate your service.

Sincerely,

Jennifer Kain

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Thursday, October 12, 2023 12:29:58 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Brian Whitacre  
4216 SW Binford Ave  
Gresham, OR 97080  
Bwhitacre@gmail.com

**From:** [Rebecca Hollenbeck \(orhorse1@yahoo.com\) Sent You a Personal Message](mailto:Rebecca.Hollenbeck@sierraclub.org)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, October 12, 2023 12:38:12 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

We are very, very quickly running out of time to keep our climate survivable. There is no business to be done on a dead planet.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Rebecca Hollenbeck  
27731 SW Baker Road  
Sherwood, OR 97140  
orhorse1@yahoo.com  
(503) 957-1050

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [paula.dougherty](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Climate Protection Plan  
**Date:** Thursday, October 12, 2023 12:53:23 PM

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You don't often get email from paula25lee@gmail.com. [Learn why this is important](#)

Greetings,

Given the short timeframe global scientists say we have to reduce emissions in half by 2025, it is imperative for all of our health and safety, that these rulings be as strong as possible in line with the goals of the state Climate Protection Plan, instead of fostering business-as-usual or false solutions. I'm disappointed then, to see that the DEQ is following a safe "status quo" path, rather than seizing this opportunity-- and accepting your moral responsibility-- to take the strongest possible action.

Here are my specific requests and recommendations:

1. Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon. Biomass derived fuels should not be allowed exemptions.
2. Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon. Unfortunately, since the adoption of the final CPP rules in 2021, increasing emissions from Oregon's industrial sector has become a reality when we should be holding polluters responsible for decreasing emissions.
3. Maintaining protective restrictions on methane and biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from anthropogenic carbon sources does not comply with the CPP.
4. Including export and transport facilities in emission reduction and reporting standards. Export facilities should have to list their final destinations. While they may utilize devices to reduce emissions during pumping phases, the open venting of railroad cars to reduce sparking must also be taken under consideration as should potential leakage during storage, transportation, and transfers. Any substantive change of site use should require a new Air Contaminant Discharge Permit (ACDP) or Title V permitting instead of being allowed to operate under old permits. Export facilities add to overall global emissions which affect us all in terms of climate chaos.
5. Biofuels and other so-called renewable fuels should not only be reporting on feedstocks and production methodologies, but also on the fuels used for hydrogenation, esterification or other processing to adequately access the true Carbon intensity numbers. Reporting should also include the land change values necessary to determine what other crops the land could have produced for human consumption as well as associated transportation and fertilizer emissions, and the like for a full picture. Carbon intensity modeling is problematic in numerous ways which is why actual monitoring data and health assessments are preferable.

Thank you for considering these changes, and for doing the right thing by future generations. DEQ is in a position of great power, and great responsibility-- please seize it!

I appreciate your service,

**Paula Dougherty**

NW Raleigh St.  
Portland, Oregon

**From:** [Darcy Sharpe](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, October 12, 2023 1:04:14 PM

---

You don't often get email from darcy.sharpe@gmail.com. [Learn why this is important](#)

Chair George, Vice Chair Baraso, members of the Commission:

My name is Darcy, and I am writing this testimony because as a community member, and aunt, my most fundamental responsibility is to protect current and future generations from harm, and irreversible climate change gravely threatens their future.

The Climate Protection Program is absolutely critical for Oregon to reduce our climate pollution on the urgent timeline dictated by current science. However, I am deeply concerned that the current proposed rules would undermine the effectiveness of the CPP, and put the necessary emissions reductions out of reach.

Specifically, I am worried that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane offsets, which will hinder the transition to non-emitting alternatives, while failing to deliver direct benefits to Oregonians. I am also worried that the rules as currently written will allow new industrial emitters to produce unrestricted climate pollution in Oregon.

I am asking DEQ to make the following important changes to the rulemaking:

**Restrict biomethane (aka renewable natural gas (RNG) and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians.** The stated goals of the CPP are to reduce greenhouse gas emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers, and out-of-state offsets accomplish none of those goals.

**Strengthen emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction (BAER) program.** As the only existing state regulation on major industrial emitters, it is vital that the CPP works to ensure science-based emissions reductions from existing stationary sources and deter development of new stationary sources in Oregon. Given Oregon's growing industrial sector, it is especially critical that DEQ use this rulemaking to strengthen the integrity of the BAER program. Large industrial emitters must be held accountable for their climate pollution.

Oregon families need the Climate Protection Program to live up to its name. Please strengthen the rules so it can protect our children's future, not corporate profits.

Thank you for the opportunity to comment on this rulemaking.

Respectfully,

Darcy

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Thursday, October 12, 2023 1:24:35 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Gary Walker  
610 Snead Dr N OR  
Keizer, OR 97303  
gjwalk@comcast.net

**From:** [Brittany Scott](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Cc:** [Lafferty, Susan G \(WAS - X75589\)](#); [Kriha, Andy \(WAS - X75598\)](#); [Grant Stevens](#); [Ian Gordon](#)  
**Subject:** Submission for DEQ Climate 2023 Rulemaking Comment  
**Date:** Thursday, October 12, 2023 1:33:46 PM  
**Attachments:** [Parkland Corporation - Comments in Response of DEQ Climate 2023 Rulemaking.pdf](#)

---

You don't often get email from [brittany.scott@parkland.ca](mailto:brittany.scott@parkland.ca). [Learn why this is important](#)

Hello,

Please find attached public comment for the DEQ Climate 2023 Rulemaking from Parkland Corporation.

Thanks,

**Brittany J.A. Scott** | [Legal Counsel](#)  
Parkland Corporation  
Suite 1800, 240 4<sup>th</sup> Ave SW Calgary, AB T2P 4H4  
**W:** 587.230.3936 | **M:** 403.966.7220 | **E:** [brittany.scott@parkland.ca](mailto:brittany.scott@parkland.ca)

**NOTICE OF CONFIDENTIALITY**

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**From:** [Jon Simonson](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** CPP Charges  
**Date:** Thursday, October 12, 2023 1:34:21 PM

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You don't often get email from jonsimonson@msn.com. [Learn why this is important](#)

All CPP implementation should focus on reducing costs, supporting RNG, and supporting hydrogen blending with natural gas. Any attempt to reduce natural gas connections should be shunned. During an ice storm 2 winters ago, I was without power for several days. Because I have natural gas I had hot water, I could heat with my gas fire place, and I could cook with the stove and natural gas BBQ.

Jon Simonson  
Happy Valley, OR

**From:** [Lindsey Rice](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Cc:** [Chad Stokes](#)  
**Subject:** Comments on 2023 CPP Rulemaking  
**Date:** Thursday, October 12, 2023 1:55:53 PM  
**Attachments:** [image001.png](#)  
[AWEC DEQ Comments.pdf](#)

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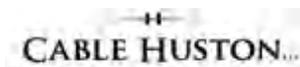
You don't often get email from [lrice@cablehuston.com](mailto:lrice@cablehuston.com). [Learn why this is important](#)

Good afternoon,

Attached please find Alliance of Western Energy Consumers comments on the DEQ's 2023 Climate Protection Plan rulemaking.

Please let us know if you have any questions.

Thank you,  
Lindsey



1455 SW Broadway, Suite 1500  
Portland, OR 97201-3412

**Lindsey Rice**

Legal Assistant to Tommy Brooks,  
Chad Stokes, Laura Westmeyer,  
and Tyler Whitney

**Phone** 503-224-3092

**Email** [lrice@cablehuston.com](mailto:lrice@cablehuston.com)

**Web** [www.cablehuston.com](http://www.cablehuston.com)

**From:** [Carol McFarland \(camlaw930@gmail.com\) Sent You a Personal Message](mailto:Carol.McFarland@camlaw930@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, October 12, 2023 1:57:24 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

Renewable Offsets are unacceptable in Oregon in the fight against climate change

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking ? if done well ? will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits? ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

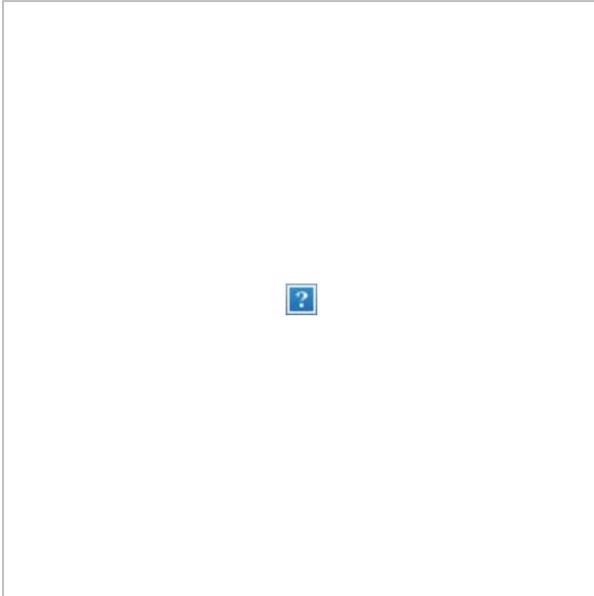
Carol McFarland  
8065 SE Grand AVE # 302  
Portland, OR 97367  
camlaw930@gmail.com  
(503) 936-6738

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at [member.care@sierraclub.org](mailto:member.care@sierraclub.org) or (415) 977-5673.

**From:** [Brad Staub](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Fwd: Scan 101223  
**Date:** Thursday, October 12, 2023 2:35:27 PM  
**Attachments:** [Scan\\_101223.pdf](#)

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**From:** [Craig Heverly](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** DEQ 2023  
**Date:** Thursday, October 12, 2023 2:43:37 PM

---

You don't often get email from heverlyjc@hevanet.com. [Learn why this is important](#)

Hello,

Given the short timeframe global scientists say we have to reduce emissions in half by 2025, it is imperative for all of our health and safety, that these rulings be as strong as possible in line with the goals of the state Climate Protection Plan, instead of fostering business-as-usual or false solutions. I'm disappointed then, to see that the DEQ is following a safe "status quo" path, rather than seizing this opportunity-- and accepting your moral responsibility-- to take the strongest possible action.

Here are my specific requests and recommendations:

1. Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon. Biomass derived fuels should not be allowed exemptions.
2. Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon. Unfortunately, since the adoption of the final CPP rules in 2021, increasing emissions from Oregon's industrial sector has become a reality when we should be holding polluters responsible for decreasing emissions.
3. Maintaining protective restrictions on methane and biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from anthropogenic carbon sources does not comply with the CPP.
4. Including export and transport facilities in emission reduction and reporting standards. Export facilities should have to list their final destinations. While they may utilize devices to reduce emissions during pumping phases, the open venting of railroad cars to reduce sparking must also be taken under consideration as should potential leakage during storage, transportation, and transfers. Any substantive change of site use should require a new Air Contaminant Discharge Permit (ACDP) or Title V permitting instead of being allowed to operate under old permits. Export facilities add to overall global emissions which affect us all in terms of climate chaos.
5. Biofuels and other so-called renewable fuels should not only be reporting on feedstocks and production methodologies, but also on the fuels used for hydrogenation, esterification or other processing to adequately access the true Carbon intensity numbers. Reporting should also include the land change values necessary to determine what other crops the land could have produced for human consumption as well as associated transportation and fertilizer emissions, and the like for a full picture. Carbon intensity modeling is problematic in numerous ways which is why actual monitoring data and health assessments are preferable.

Thank you for considering these changes, and for doing the right thing by future generations. DEQ is in a position of great power, and great responsibility-- please seize it! I appreciate your service.

Sincerely,

Craig Heverly

**From:** [Sarah Baker](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Comments on DEQ Climate 2023 Rulemaking  
**Date:** Thursday, October 12, 2023 2:44:59 PM

---

You don't often get email from sarahrochellebaker@gmail.com. [Learn why this is important](#)

Hello,

Though I am sending a cut and paste request, I stand by everything detailed here. Thank you for your time.

Given the short timeframe global scientists say we have to reduce emissions in half by 2025, it is imperative for all of our health and safety, that these rulings be as strong as possible in line with the goals of the state Climate Protection Plan, instead of fostering business-as-usual or false solutions. I'm disappointed then, to see that the DEQ is following a safe "status quo" path, rather than seizing this opportunity-- and accepting your moral responsibility-- to take the strongest possible action.

Here are my specific requests and recommendations:

1. Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon. Biomass derived fuels should not be allowed exemptions.
2. Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon. Unfortunately, since the adoption of the final CPP rules in 2021, increasing emissions from Oregon's industrial sector has become a reality when we should be holding polluters responsible for decreasing emissions.
3. Maintaining protective restrictions on methane and biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from anthropogenic carbon sources does not comply with the CPP.
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fertilizer emissions, and the like for a full picture. Carbon intensity modeling is problematic in numerous ways which is why actual monitoring data and health assessments are preferable.

Thank you for considering these changes, and for doing the right thing by future generations. DEQ is in a position of great power, and great responsibility-- please seize it! I appreciate your service.

--

Sarah Baker  
She/Her  
[Styled By Baker](#)  
[Making Earth Cool](#)

Portland, OR USA  
C: [831.252.2223](tel:831.252.2223)

**From:** [CPP INFO \\* DEQ](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** FW: RAC Comment Letter  
**Date:** Thursday, October 12, 2023 2:47:27 PM  
**Attachments:** [OHBA DEQ RAC Letter.docx](#)

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**From:** Jodi Hack <jodi@oregonhba.com>  
**Sent:** Wednesday, October 11, 2023 9:38 AM  
**To:** CPP INFO \* DEQ <CPP.INFO@deq.oregon.gov>  
**Subject:** RAC Comment Letter

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Sent from my iPad

**From:** [Jennifer Schloming](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Comments on DEQ Climate 2023 Ruling  
**Date:** Thursday, October 12, 2023 2:51:31 PM

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You don't often get email from [jenniferschloming@gmail.com](mailto:jenniferschloming@gmail.com). [Learn why this is important](#)

To Whom It may Concern,

Given the short timeframe global scientists say we have to reduce emissions in half by 2025, it is imperative for all of our health and safety, that these rulings be as strong as possible in line with the goals of the state Climate Protection Plan, instead of fostering business-as-usual or false solutions. I'm horrified then, to see that the DEQ is following a safe "status quo" path, rather than seizing this opportunity-- and accepting your moral responsibility-- to take the strongest possible action.

Here are my specific requests and recommendations:

1. Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon. Biomass derived fuels should not be allowed exemptions.
2. Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon. Unfortunately, since the adoption of the final CPP rules in 2021, increasing emissions from Oregon's industrial sector has become a reality when we should be holding polluters responsible for decreasing emissions.
3. Maintaining protective restrictions on methane and biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from anthropogenic carbon sources does not comply with the CPP.
4. Including export and transport facilities in emission reduction and reporting standards. Export facilities should have to list their final destinations. While they may utilize devices to reduce emissions during pumping phases, the open venting of railroad cars to reduce sparking must also be taken under consideration as should potential leakage during storage, transportation, and transfers. Any substantive change of site use should require a new Air Contaminant Discharge Permit (ACDP) or Title V permitting instead of being allowed to operate under old permits. Export facilities add to overall global emissions which affect us all in terms of climate chaos.
5. Biofuels and other so-called renewable fuels should not only be reporting on feedstocks and production methodologies, but also on the fuels used for hydrogenation, esterification or other processing to adequately access the true Carbon intensity numbers. Reporting should also include the land change values necessary to determine what other crops the land could have produced for human consumption as well as associated transportation and fertilizer emissions, and the like for a full picture. Carbon intensity modeling is problematic in numerous ways which is why actual monitoring data and health assessments are preferable.

Thank you for considering these changes, and for doing the right thing by future generations. DEQ is in a position of great power, and great responsibility-- please seize it! As a graduate of Stanford University's Human Biology Program, I am well aware that this is science that has been established fact for decades. We cannot afford middle ground--it no longer exists. I appreciate your forthright commitment to courageous service. Our lives depend upon it.

Jennifer Schloming  
9170 N Edison  
Portland, OR

**From:** [Zora H](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Comments on DEQ Climate 2023 Rulemaking  
**Date:** Thursday, October 12, 2023 3:12:30 PM

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You don't often get email from zorabhess@gmail.com. [Learn why this is important](#)

Hello,

The time is now!

Given the short timeframe global scientists say we have to reduce emissions in half by 2025, it is imperative for all of our health and safety, that these rulings be as strong as possible in line with the goals of the state Climate Protection Plan, instead of fostering business-as-usual or false solutions. I'm disappointed then, to see that the DEQ is following a safe "status quo" path, rather than seizing this opportunity-- and accepting your moral responsibility-- to take the strongest possible action.

Here are my specific requests and recommendations:

1. Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon. Biomass derived fuels should not be allowed exemptions.
2. Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon. Unfortunately, since the adoption of the final CPP rules in 2021, increasing emissions from Oregon's industrial sector has become a reality when we should be holding polluters responsible for decreasing emissions.
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Thank you for considering these changes, and for doing the right thing by future generations. DEQ is in a position of great power, and great responsibility-- please seize it! I appreciate your service.

Sincerely,  
Zora Hess

**From:** [Marilyn Mitton](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Comments on DEQ Climate 2023 Rule Making  
**Date:** Thursday, October 12, 2023 3:18:12 PM

---

You don't often get email from marilynmitton@nvgbell.net. [Learn why this is important](#)

Hello--

Given the short timeframe global scientists say we have to reduce emissions in half by 2025, it is imperative for all of our health and safety, that these rulings be as strong as possible in line with the goals of the state Climate Protection Plan, instead of fostering business-as-usual or false solutions. I'm disappointed then, to see that the DEQ is following a safe "status quo" path, rather than seizing this opportunity-- and accepting your moral responsibility-- to take the strongest possible action.

I am sending specific requests and recommendations to your team:

1. Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon. Biomass derived fuels should not be allowed exemptions.
2. Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon. Unfortunately, since the adoption of the final CPP rules in 2021, increasing emissions from Oregon's industrial sector has become a reality when we should be holding polluters responsible for decreasing emissions.
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Thank you for considering these changes, and for doing the right thing by future generations. DEQ is in a position of great power, and great responsibility-- please seize it! I appreciate your service.

Marilyn Mitton  
NW Portland

**From:** [Frann Michel](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Comments on DEQ Climate 2023 Rulemaking  
**Date:** Thursday, October 12, 2023 3:31:29 PM

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[You don't often get email from fmichel@willamette.edu. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Greetings,

The Climate 2023 Rulemaking should move vigorously to take the strongest possible action to reduce emissions and protect our climate. We are facing an emergency and need to address it as such.

For instance, I commend the addition of 340-215-0130 to OAR Chapter 340, Division 215 to specify separate violations.

I also offer the following additional requests and recommendations:

1. Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of “book and claim” accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon. Biomass derived fuels should not be allowed exemptions.
2. Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon. Unfortunately, since the adoption of the final CPP rules in 2021, increasing emissions from Oregon’s industrial sector has become a reality when we should be holding polluters responsible for decreasing emissions.
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ways which is why actual monitoring data and health assessments are preferable.

Thank you for considering these changes, and for doing the right thing by future generations. DEQ is in a position of great power, and great responsibility-- please seize it! I appreciate your service.

Sincerely,

Frann Michel, Ph.D.  
fmichel@willamette.edu

**From:** [Dave King](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Climate rulemaking 2023  
**Date:** Thursday, October 12, 2023 3:41:39 PM

---

You don't often get email from [davewaveking@gmail.com](mailto:davewaveking@gmail.com). [Learn why this is important](#)

Hello, I live near the blue Liquid Natural Gas (methane) storage tank near the St John's Bridge. I imagine what will happen when the big earthquake comes nearly every night. Doesn't promote sweet dreams.

Thank you, Dave King

Given the short timeframe global scientists say we have to reduce emissions in half by 2025, it is imperative for all of our health and safety, that these rulings be as strong as possible in line with the goals of the state Climate Protection Plan, instead of fostering business-as-usual or false solutions. I'm disappointed then, to see that the DEQ is following a safe "status quo" path, rather than seizing this opportunity-- and accepting your moral responsibility-- to take the strongest possible action.

Here are my specific requests and recommendations:

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fertilizer emissions, and the like for a full picture. Carbon intensity modeling is problematic in numerous ways which is why actual monitoring data and health assessments are preferable.

Thank you for considering these changes, and for doing the right thing by future generations. DEQ is in a position of great power, and great responsibility-- please seize it! I appreciate your service.

**From:** [Kate Miller](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Thursday, October 12, 2023 3:43:34 PM

---

You don't often get email from millerjkate@gmail.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

However, I was disappointed to hear that the recent rule-making table did not include community input, and also that the results lacked in meeting the plan's original goals of reducing greenhouse gas emissions by 50%, providing meaningful investments to benefit Oregonians, and holding big polluters accountable.

Therefore, I am calling on the DEQ to adapt the rules for CPP implementation to focus on the original goals of:

- 1) Reducing greenhouse gas emissions and other air pollutants, maximizing public health benefits, and minimizing costs for consumers in environmental justice and other communities in Oregon.
- 2) Keeping economic and health benefits of the Community Climate Investment program in Oregon: investments should materially benefit Oregonians at the frontlines of pollution and the climate crisis, rather than paying for cheap offsets in other places.
- 3) Achieving real reduction of emissions by 50%, rather than allowing companies to invest in biomass-derived fuels such as "renewable natural gas" (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
- 4) Holding big polluters accountable to engage in science-based "best available emissions reductions" (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.
- 5) Returning the date for a "new source" of stationary pollution to December 31, 2021.

The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
Kate Miller  
421 Middlecrest Road  
Lake Oswego, OR 97034

**From:** [Philip Higgins](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** proposed Climate 2023 Rulemaking  
**Date:** Thursday, October 12, 2023 3:56:18 PM

---

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Dear DEQ Team,

I want to share my concerns and thoughts about the proposed changes to the Climate 2023 Rulemaking by DEQ. These changes involve Bio-Methane regulation, Book and Claim accounting, commercial Hydrogen, and the "Lookback" for Covered Entities.

First, it's essential to understand that petroleum-based energy, despite criticism, plays a vital role in Oregon's economy. It not only provides energy but also contributes to economic development and job creation. We should consider the benefits and potential costs of all energy choices, especially in terms of economic impact and human well-being.

During a recent DEQ climate Rulemaking Public Hearing on September 18th, it became clear that some groups have reservations about allowing covered entities in Oregon to use book and claim accounting for Bio-Methane from other states. However, these groups seem to support the use of electric vehicles made outside Oregon and the importation of out-of-state electricity, even without direct economic benefits to our citizens. This creates a difference in standards between Bio-Methane and out-of-state electricity.

We urge DEQ to maintain the current regulations for Bio-Methane without further changes. Book and claim accounting has worked well for using out-of-state Bio-Methane in Oregon's electricity generation. Changing these rules could lead to higher electricity costs, impacting consumers, including those in environmental justice communities. To minimize costs and achieve equity, DEQ should refrain from altering existing regulations. Technological advancements can help with CO2 levels, but economic distress from hasty rule changes cannot be easily reversed.

We believe Bio-Methane should not be subject to geographical constraints for book and claim reporting. There should be no requirements to inject Bio-Methane into an Oregon natural gas pipeline, no restrictions on vintage use for greenhouse gas reporting, and no time constraints. Bio-Methane should be allowed to be claimed and delivered to end-users in Oregon, even if it displaces natural gas used in a connected pipeline.

The book and claim regulations established by DEQ at the start of the Greenhouse Gas Reporting program should remain unchanged. They strike a balance between environmental concerns and our state's energy infrastructure needs.

Hydrogen, especially "Gray" and "Blue" Hydrogen, is a lower emissions alternative worth considering. Electric vehicles, while promoted as environmentally friendly, are not entirely carbon neutral, and their production outside Oregon doesn't benefit our state's economy. We must

consider the entire lifecycle and make informed decisions.

Altering book and claim rules could lead to an energy crisis in Oregon, impacting citizens and energy stability. We believe a one-year lookback period should be incorporated into the regulations to benefit all covered entities.

Thank you for your commitment to responsible governance and reliable energy stewardship.

Sincerely,

**Philip E Higgins**

**Principal Broker | OR & WA**

OR Lic # 960900059 / WA Lic # 50197

Direct: 503-793-9039 | [phiggins@PacificCrestREA.com](mailto:phiggins@PacificCrestREA.com)

809 E. First St. Newberg OR 97132

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Oregon Real Estate Agency Pamphlet: <https://www.oregon.gov/rea/licensing/Documents/Initial-Agency-Disclosure-Pamphlet.pdf>

Washington Real Estate Agency Pamphlet: <http://apps.leg.wa.gov/rcw/default.aspx?cite=18.86.120>

**From:** [Martina Simpkins](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Cc:** [Keri Richardson Bevel](#); [Randy Lack](#); [Janet Peace](#)  
**Subject:** Anew Climate Comments  
**Date:** Thursday, October 12, 2023 3:57:13 PM  
**Attachments:** [Outlook-Logo Desc.png](#)  
[Anew comment DEQ .Oct12.2023.pdf](#)

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You don't often get email from msimpkins@anewclimate.com. [Learn why this is important](#)

Hello,

please find attached comments from Anew Climate.

Regards,  
Martina Simpkins

**Martina Simpkins**  
Senior Director, Policy  
m. 571 548 1293

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**anew**

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**From:** [SIMAN PATARIA](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** DEQ rule-making  
**Date:** Thursday, October 12, 2023 4:00:29 PM

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You don't often get email from simanpataria@gmail.com. [Learn why this is important](#)

Dear DEQ Team,

I want to share my concerns and thoughts about the proposed changes to the Climate 2023 Rulemaking by DEQ. These changes involve Bio-Methane regulation, Book and Claim accounting, commercial Hydrogen, and the "Lookback" for Covered Entities.

First, it's essential to understand that petroleum-based energy, despite criticism, plays a vital role in Oregon's economy. It not only provides energy but also contributes to economic development and job creation. We should consider the benefits and potential costs of all energy choices, especially in terms of economic impact and human well-being.

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economy. We must consider the entire lifecycle and make informed decisions.

Altering book and claim rules could lead to an energy crisis in Oregon, impacting citizens and energy stability. We believe a one-year lookback period should be incorporated into the regulations to benefit all covered entities.

Thank you for your commitment to responsible governance and reliable energy stewardship.

Sincerely,  
Thank You  
Siman Pataria  
360-609-7713

**From:** [Ginger Rayl](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Concerns.  
**Date:** Thursday, October 12, 2023 4:02:23 PM

---

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Dear DEQ Team,

I want to share my concerns and thoughts about the proposed changes to the Climate 2023 Rulemaking by DEQ. These changes involve Bio-Methane regulation, Book and Claim accounting, commercial Hydrogen, and the "Lookback" for Covered Entities.

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Sincerely,

**Ginger Rayl**

**From:** [Michael Skidmore](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Fossil fuels  
**Date:** Thursday, October 12, 2023 4:03:03 PM  
**Attachments:** [Dear DEQ Team.docx](#)

---

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Michael Skidmore

Sent from my iPhone

**From:** [Maren Salomon \(astaknowsnick@gmail.com\) Sent You a Personal Message](mailto:astaknowsnick@gmail.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Make this 2023 Climate Rulemaking Count!  
**Date:** Thursday, October 12, 2023 4:03:26 PM

---

Dear Oregon Department of Environmental Quality - 2023 CCP,

As an Oregonian I am extremely concerned about our State's ability to reach our climate goals. To fail to do so is to fail the next generation. There are currently too many loopholes to properly hold industry to the standards necessary to make change.

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking if done well will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,

Maren Salomon  
738 ne going street  
Portland, OR 97211  
astaknowsnick@gmail.com  
(909) 896-2533

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977-5673.

**From:** [Jeff Hagge](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** DEQ Public Comment on 2023 Climate Rulemaking  
**Date:** Thursday, October 12, 2023 4:05:29 PM

---

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Dear DEQ Team,

I want to share my concerns and thoughts about the proposed changes to the Climate 2023 Rulemaking by DEQ. These changes involve Bio-Methane regulation, Book and Claim accounting, commercial Hydrogen, and the "Lookback" for Covered Entities.

First, it's essential to understand that petroleum-based energy, despite criticism, plays a vital role in Oregon's economy. It not only provides energy but also contributes to economic development and job creation. We should consider the benefits and potential costs of all energy choices, especially in terms of economic impact and human well-being.

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Thank you for your commitment to responsible governance and reliable energy stewardship.

Please enter this comment into the record.

Sincerely,

**Jeff Hagge**

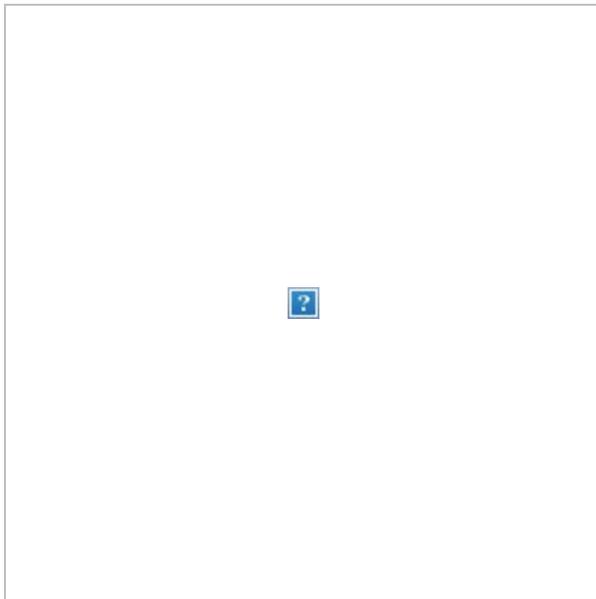
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**541-887-8902**

[jeff.hagge@edstaub.com](mailto:jeff.hagge@edstaub.com)

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**From:** [Kate Fenters](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** DEQ Rulemaking  
**Date:** Thursday, October 12, 2023 4:06:41 PM

---

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Dear DEQ Team,

I want to share my concerns and thoughts about the proposed changes to the Climate 2023 Rulemaking by DEQ. These changes involve Bio-Methane regulation, Book and Claim accounting, commercial Hydrogen, and the "Lookback" for Covered Entities.

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Thank you for your commitment to responsible governance and reliable energy stewardship.

Sincerely,

Kate Fenters

**From:** [Kate Fenters](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** DEQ  
**Date:** Thursday, October 12, 2023 4:08:11 PM

---

You don't often get email from kate.saunders.1989@gmail.com. [Learn why this is important](#)

Dear DEQ Team,

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Sincerely,  
Kate

**From:** [DJ Builta](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** DEQ Rulemaking Comments Attached  
**Date:** Thursday, October 12, 2023 4:08:38 PM  
**Attachments:** [Dear DEQ Team 10-22-23.docx](#)

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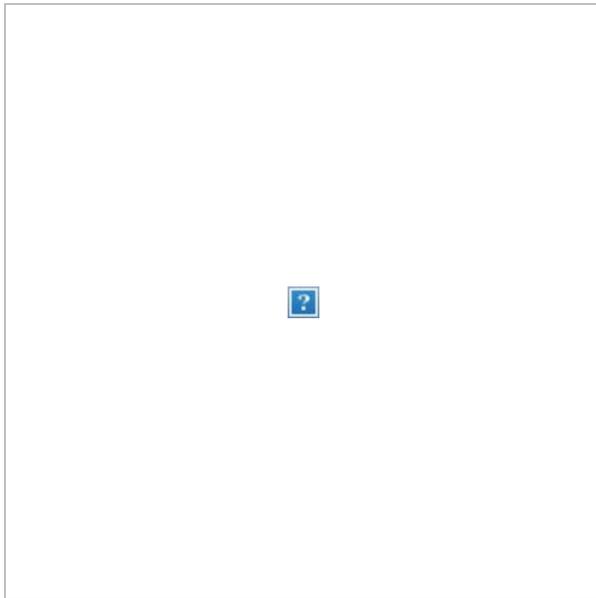
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Please see the attached comments regarding the current DEQ Rulemaking.

Thank You for Your time, and consideration.

Have a Blessed Day!

DJ Builta  
Fuel Buyer  
Ed Staub & Sons Petroleum  
Support Center  
541-891-9585  
[dj.builta@edstaub.com](mailto:dj.builta@edstaub.com)  
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**From:** [Jane Gorham](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** LETTER  
**Date:** Thursday, October 12, 2023 4:12:08 PM  
**Attachments:** [DEQ LETTER.pdf](#)

---

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Good afternoon

Please see attached,

Jane

--

**Jane Gorham**  
**Customer Service Representative**  
**Redmond**  
**541-504-8265**  
[jane.gorham@edstaub.com](mailto:jane.gorham@edstaub.com)  
[www.edstaub.com](http://www.edstaub.com)

**From:** [Cindi Smith](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Fwd: Attached Image  
**Date:** Thursday, October 12, 2023 4:12:10 PM  
**Attachments:** [1609\\_001.pdf](#)

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**Cindi Smith**  
**Customer Account Rep**  
**Ed Staub & Sons Petroleum**  
**541-330-8356**  
[cindi.smith@edstaub.com](mailto:cindi.smith@edstaub.com)  
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**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Fwd: Attached Image  
**Date:** Thursday, October 12, 2023 4:16:48 PM  
**Attachments:** [1610\\_001.pdf](#)

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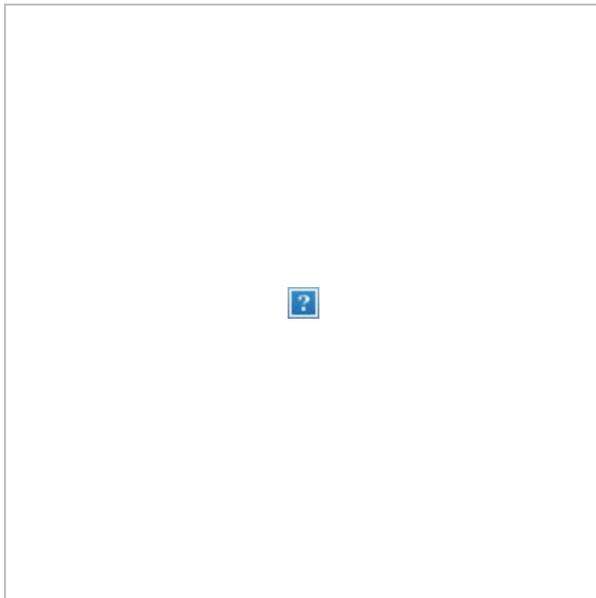
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**To:** David Fredrickson <[david.fredrickson@edstaub.com](mailto:david.fredrickson@edstaub.com)>

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**Driver**  
**Redmond**  
**541-536-4729**  
[david.fredrickson@edstaub.com](mailto:david.fredrickson@edstaub.com)  
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**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Thursday, October 12, 2023 4:20:36 PM

---

Dear Nicole Singh,

I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) and renewable propane because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG and renewable propane would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.

- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and renewable propane and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and renewable propane and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Margaret Hiatt  
11411 SW 51st Ave  
Portland, OR 97219  
[peggy.hiatt@gmail.com](mailto:peggy.hiatt@gmail.com)

**From:** [Jes Pack](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** DEQ Climate 2023  
**Date:** Thursday, October 12, 2023 4:27:08 PM  
**Attachments:** [DEQ Letter.pdf](#)

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Please find a letter of concern attached to this email.

Thank you and regards,

--

**Jes Pack**

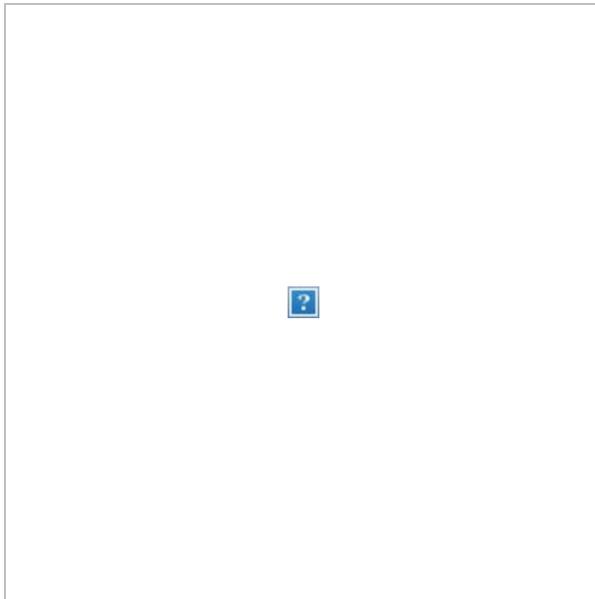
Cardlock Administrator

Bend

**541-330-8356**

[\*\*jes.pack@edstaub.com\*\*](mailto:jes.pack@edstaub.com)

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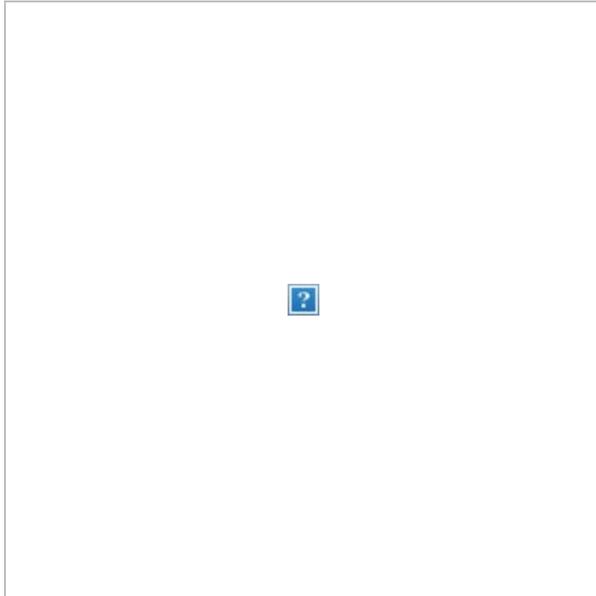
**From:** [Bryan Bailey](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Comment attached.  
**Date:** Thursday, October 12, 2023 4:27:50 PM  
**Attachments:** [SEd Staub &23101215530.pdf](#)

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**Bryan Bailey**  
**Bulk Plant Manager**  
**Hermiston**  
**541-289-5015**  
[bryan.bailey@edstaub.com](mailto:bryan.bailey@edstaub.com)  
[www.edstaub.com](http://www.edstaub.com)



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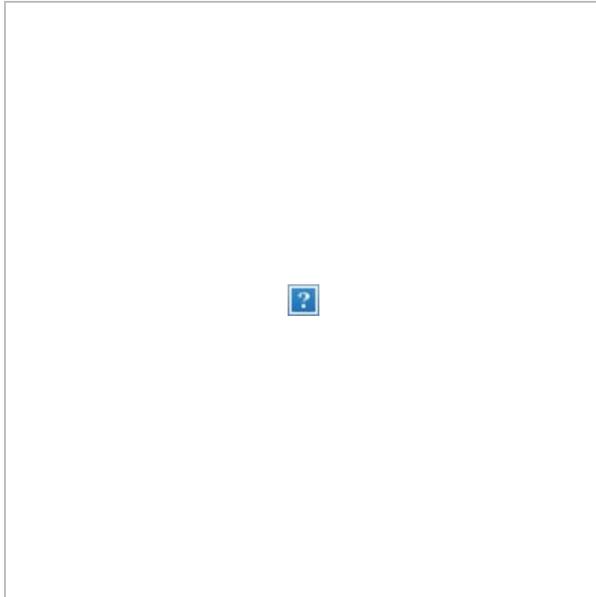
**From:** [Tara Whiteman](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** CLIMATE 2023  
**Date:** Thursday, October 12, 2023 4:28:17 PM  
**Attachments:** [20231012 Altering book and claim rules could lead to an energy .pdf](#)

---

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Please see attached letter regarding regulations.

Tara Whiteman  
Accounts Payable  
Ed Staub & Sons Petroleum  
Support Center  
541-887-8910  
[tara.whiteman@edstaub.com](mailto:tara.whiteman@edstaub.com)  
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**From:** [Lauren Lamb](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Climate 2023 Rulemaking: Appendix of Proposed Rules  
**Date:** Thursday, October 12, 2023 4:36:30 PM

---

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Dear Nicole and Elizabeth,

Our core business at BerQ RNG is developing and operating projects that turn biogas into RNG, creating healthy returns for our investors and project partners. We focus on developing small to medium-sized projects in Ontario, Quebec, and the Mid-Western to the North-Eastern United States. Our team brings their 95+ years of combined industry experience to each project, is technology agnostic, and chooses the best in class technology for each specific development.

We are a lean RNG developer with several projects in execution, helping dairy farms, municipalities, and Fortune 500 companies to reduce their environmental impact and create economic value.

BerQ RNG offers the following comments regarding the Oregon Department of Environmental Quality's (DEQ) final draft Appendix of Proposed Rules. Specifically, we would like to express our support for, and urge DEQ to finalize its current definition for "Book and Claim" within the Greenhouse Gas Reporting Program (GGRP) portion of the regulations, as follows:

*"Book and Claim" refers to the accounting methodology where the environmental attributes of an energy source are detached from the physical molecules when they are commingled into a common transportation and distribution system for that form of energy. The detached attributes are then assigned by the owner to the same form and amount of energy when it is used. For the purposes of this division, the common transportation and distribution system must be connected to Oregon.*

### **Maintaining Alignment with Existing Programs in Oregon and Worldwide**

This framework remains in line with existing policies in Oregon which are designed to incent the development and use of renewable gas, an array of state- and federal-level programs, and international standards that govern greenhouse gas (GHG) accounting:

Oregon's renewable gas procurement targets established by SB 98<sup>[1]</sup> and the Clean Fuels Program<sup>[2]</sup> are two key programs which are designed to incent the use of renewable natural gas (RNG) in Oregon's residential & commercial thermal and transportation sectors. These sectors comprised around 69% of the state's GHG emissions in 2021,<sup>[3]</sup> requiring expedient deployment of clean fuels and electricity to decarbonize. **DEQ's current draft Book and Claim definition fits with these programs, which allow for the procurement of renewable gas via existing energy transportation and distribution infrastructure.**

The use of market-based instruments within a system that utilizes book-and-claim accounting can be seen in Renewable Gas Standard and Clean Heat Standard policies in California, Colorado,

Minnesota, New Hampshire, British Columbia, and Quebec. The same system is employed under Low-Carbon Fuel Standard programs in California, Washington, British Columbia, and Canada on the federal level, as well as EPA's Renewable Fuel Standard. Furthermore, other voluntary renewable energy procurement frameworks from World Resources Institute, Climate Disclosure Project, The Climate Registry, RE100, and Airport Carbon Accreditation allow for the purchase of RNG certificates to qualify in this manner.

Importantly, GHG accounting leader World Resources Institute (WRI) is currently updating its standards surrounding market-based procurement. Their recently published guidance explicitly allows companies reporting under the Greenhouse Gas Protocol to use market-based instruments for renewable gas purchases, stating that "companies purchasing certificates may wish to consult with their auditors and consider rules provided by relevant target-setting programs or applicable regulatory schemes in their jurisdiction(s) on how to report these purchases in their reports."<sup>[4]</sup> In other words, these existing Book and Claim practices are deemed acceptable by WRI.

### **Avoid Limitations Which Would Hurt Renewable Energy Growth**

In finalizing its Book and Claim definition, DEQ must consider not only the objective of maintaining alignment with existing programs, but also the effects of potential limitations on market-based instruments. Specifically, we urge DEQ not to place artificial geographic limitations on renewable energy supply that are not also placed on the use of conventional energy supply. For example, in the case of imported renewable gas, such limitations would stifle industry growth in a time where it remains crucial to replace imported fossil gas and reduce methane emissions in the organic waste sector.

Injection into a common pipeline system is the lowest-GHG way of transporting renewable gases, book-and-claim layers well on top of the way conventional gas is traded and incentivizes the buildout of RNG resources in a rational way beginning with the most cost-effective projects. Renewable gas producers cannot change physical flow of the gas system significantly until volumes reach scale and displace a significant share of fossil gas. The supply of conventional gas which currently serves Oregon primarily originates out of state; the existing market for physical gas delivery optimizes moving gas from supply to demand in a least cost and generally lowest GHG manner.

Maintaining consistency and fungibility between all North American RNG markets through the aligned use of book-and-claim will increase competitiveness, improve investment certainty, and lead to the sustainable growth of the renewable gaseous fuel industry. The use of full book-and-claim accounting for the vast majority of North American RNG has already resulted in overwhelmingly positive greenhouse gas emission reductions.

### **Conclusion**

BerQ RNG appreciates the opportunity to provide feedback in support of DEQ's current draft regulations regarding renewable gas procurement under the GGRP. We urge DEQ to uphold this framework to incent (1) recycling of organic waste into renewable fuels and platform molecules which can (2) replace fossil-derived fuels and feedstocks in various sectors of the economy while (3)

reducing methane emissions and improving other air and water quality impacts associated with waste management in Oregon and beyond.

Sincerely,  
Lauren Lamb  
Environmental Attribute Manager  
BerQ RNG  
[laurenl@berqrng.com](mailto:laurenl@berqrng.com)  
+1.412.925.0160



---

[1] <https://olis.oregonlegislature.gov/liz/2019R1/Downloads/MeasureDocument/SB98/A-Engrossed>

[2] <https://www.oregon.gov/deq/ghgp/cfp/pages/cfp-overview.aspx>

[3] <https://www.oregon.gov/deq/ghgp/pages/ghg-inventory.aspx>

[4] <https://ghgprotocol.org/blog/interim-update-accounting-biomethane-certificates>

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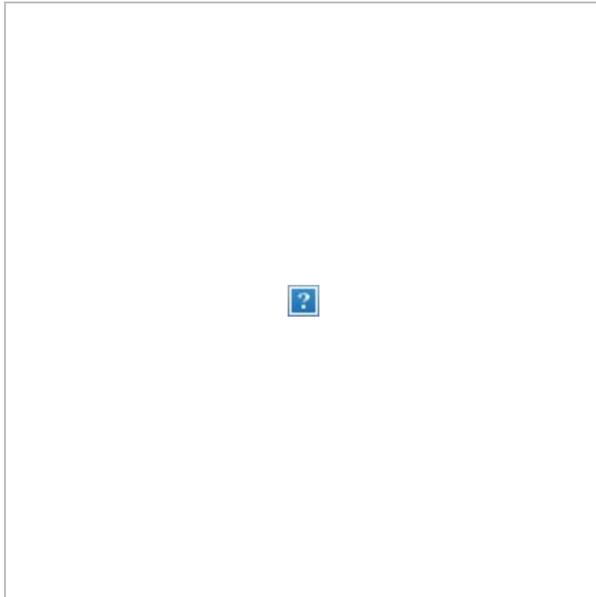
**From:** [Tim Gelhardt](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** DEQ Public Comment on 2023 Climate Rulemaking  
**Date:** Thursday, October 12, 2023 4:37:26 PM  
**Attachments:** [Dear DEQ Team.docx](#)

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**Tim Gelhardt**  
**IS Technician**  
**Ed Staub & Sons Petroleum**  
**541-887-8934**  
[tim.gelhardt@edstaub.com](mailto:tim.gelhardt@edstaub.com)  
[www.edstaub.com](http://www.edstaub.com)



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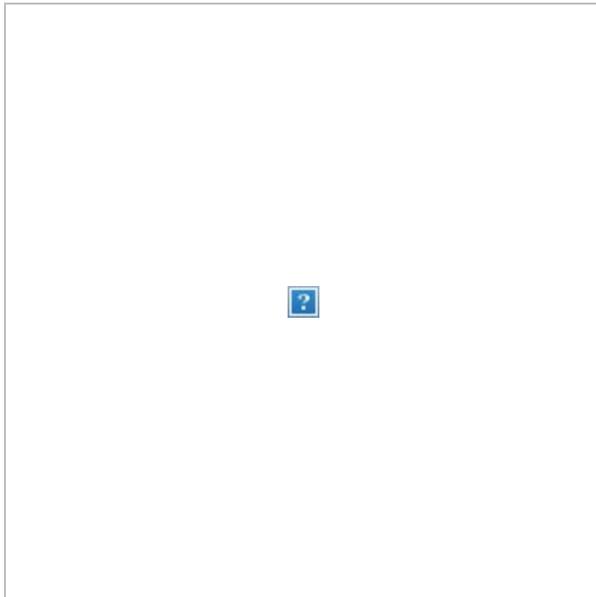
**From:** [Jenifer Isais](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Date:** Thursday, October 12, 2023 4:53:53 PM  
**Attachments:** [10122023165217.pdf](#)

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**Jenifer Isais**  
**Customer Service Representative**  
**La Pine**  
**541-536-7520**  
[jenifer.isais@edstaub.com](mailto:jenifer.isais@edstaub.com)  
[www.edstaub.com](http://www.edstaub.com)



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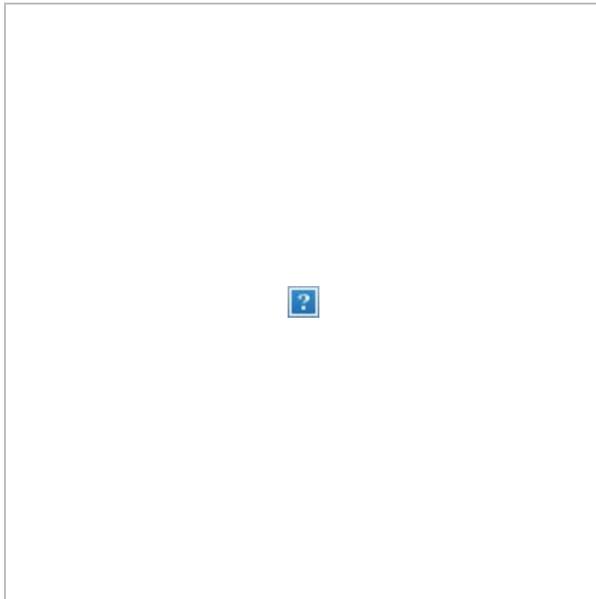
**From:** [Jenifer Isais](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Date:** Thursday, October 12, 2023 4:53:58 PM  
**Attachments:** [10122023165119.pdf](#)

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**Jenifer Isais**  
**Customer Service Representative**  
**La Pine**  
**541-536-7520**  
[jenifer.isais@edstaub.com](mailto:jenifer.isais@edstaub.com)  
[www.edstaub.com](http://www.edstaub.com)



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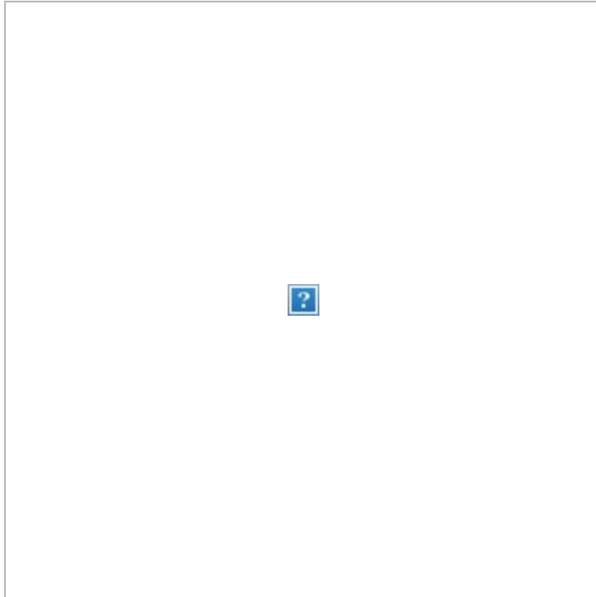
**From:** [Jenifer Isais](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Date:** Thursday, October 12, 2023 4:54:45 PM  
**Attachments:** [10122023165328.pdf](#)

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--

**Jenifer Isais**  
**Customer Service Representative**  
**La Pine**  
**541-536-7520**  
[jenifer.isais@edstaub.com](mailto:jenifer.isais@edstaub.com)  
[www.edstaub.com](http://www.edstaub.com)



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**From:** [Stephen Baxter](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, October 12, 2023 5:02:59 PM  
**Attachments:** [DEQ.pdf](#)

---

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To whom it may concern,

Please see my attached document regarding the 2023 Climate rulemaking.

Kind regards,

**Stephen Baxter**

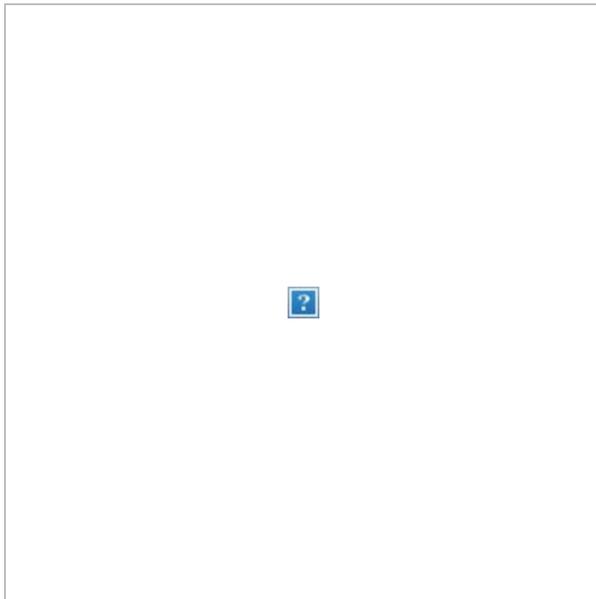
**Mechanic**

**Redmond**

**541-504-8265**

[\*\*stephen.baxter@edstaub.com\*\*](mailto:stephen.baxter@edstaub.com)

[www.edstaub.com](http://www.edstaub.com)



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**From:** [DALE REMBOLD](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** DEQ to Expand Renewables  
**Date:** Thursday, October 12, 2023 5:40:43 PM

---

You don't often get email from mdrembold@comcast.net. [Learn why this is important](#)

Dear Person:

I don't want any renewable path as it certainly becomes a muddled up mess. I am also tired of all the tricks encouraging people like me to sign up to a letter someone else wrote up. Any use of electricity in place of what we currently use is a huge mistake since electric power has been a concern for over 50 years (shortage) and the reason all household appliances wear an energy savings label worthy of tax rebates and such. Plus when you add that 70 percent of electricity is provided by fossil fuel -- it all actually becomes a joke. Create electric power with renewable energy?

Renewable energy is energy that is produced from natural processes and continuously replenished. A few examples of renewable energy are sunlight, water, wind, tides, geothermal heat, and biomass. If this is what is being proposed . . . . . lots of luck with that as it will be an order of magnitude more difficult, complicated, expensive, not able to support current requirements. And you certainly can't expect vehicles to run on that. Try selling the idea of nuclear energy and see how far you get with that.

-Dale Rembold-

**From:** [Anne Bryant](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Comments on DEQ Climate 2023 Rulemaking  
**Date:** Thursday, October 12, 2023 6:12:35 PM

---

You don't often get email from [abcounseling@pobox.com](mailto:abcounseling@pobox.com). [Learn why this is important](#)

Hello,

Given the short timeframe global scientists say we have to reduce emissions in half by 2025, it is imperative for all of our health and safety, that these rulings be as strong as possible in line with the goals of the state Climate Protection Plan, instead of fostering business-as-usual or false solutions. I'm disappointed then, to see that the DEQ is following a safe "status quo" path, rather than seizing this opportunity-- and accepting your moral responsibility-- to take the strongest possible action.

Here are my specific requests and recommendations:

1. Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon. Biomass derived fuels should not be allowed exemptions.
2. Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon. Unfortunately, since the adoption of the final CPP rules in 2021, increasing emissions from Oregon's industrial sector has become a reality when we should be holding polluters responsible for decreasing emissions.
3. Maintaining protective restrictions on methane and biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from anthropogenic carbon sources does not comply with the CPP.
4. Including export and transport facilities in emission reduction and reporting standards. Export facilities should have to list their final destinations. While they may utilize devices to reduce emissions during pumping phases, the open venting of railroad cars to reduce sparking must also be taken under consideration as should potential leakage during storage, transportation, and transfers. Any substantive change of site use should require a new Air Contaminant Discharge Permit (ACDP) or Title V permitting instead of being allowed to operate under old permits. Export facilities add to overall global emissions which affect us all in terms of climate chaos.
5. Biofuels and other so-called renewable fuels should not only be reporting on feedstocks and production methodologies, but also on the fuels used for hydrogenation, esterification or other processing to adequately access the true Carbon intensity numbers. Reporting should also include the land change values necessary to determine what other crops the land could have produced for human consumption as well as associated transportation and fertilizer emissions, and the like for a full picture. Carbon intensity modeling is problematic in numerous ways which is why actual monitoring data and health assessments are preferable.

Thank you for considering these changes, and for doing the right thing by future generations. DEQ is in a position of great power, and great responsibility-- please seize it! I appreciate your service.

Sincerely,

Anne Bryant  
97219

**From:** [Kathleen Boylan](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Comments on DEQ Climate 2023 rulings  
**Date:** Thursday, October 12, 2023 6:17:08 PM

---

You don't often get email from [kathyaboylan@gmail.com](mailto:kathyaboylan@gmail.com). [Learn why this is important](#)

Hello,

Given the short timeframe global scientists say we have to reduce emissions in half by 2025, it is imperative for all of our health and safety, that these rulings be as strong as possible in line with the goals of the state Climate Protection Plan, instead of fostering business-as-usual or false solutions. I'm disappointed then, to see that the **DEQ** is following a safe "status quo" path, rather than seizing this opportunity-- and accepting your moral responsibility-- to take the strongest possible action.

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health assessments are preferable.

Thank you for considering these changes, and for doing the right thing by future generations. DEQ is in a position of great power, and great responsibility-- please seize it! I appreciate your service.

Sincerely,  
Kathleen Boylan

**From:** [Kathleen Boylan](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Comments on DEQ Climate 2023 Rulemaking  
**Date:** Thursday, October 12, 2023 6:29:34 PM

---

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Comments on **DEQ** Climate 2023 Rulemaking

subject:

Hello,

Given the short timeframe global scientists say we have to reduce emissions in half by 2025, it is imperative for all of our health and safety, that these rulings be as strong as possible in line with the goals of the state Climate Protection Plan, instead of fostering business-as-usual or false solutions. I'm disappointed then, to see that the **DEQ** is following a safe "status quo" path, rather than seizing this opportunity-- and accepting your moral responsibility-- to take the strongest possible action.

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5. Biofuels and other so-called renewable fuels should not only be reporting on feedstocks and production methodologies, but also on the fuels used for hydrogenation, esterification or other processing to adequately access the true Carbon intensity numbers. Reporting should also include the land change values necessary to determine what other crops the land could have

produced for human consumption as well as associated transportation and fertilizer emissions, and the like for a full picture. Carbon intensity modeling is problematic in numerous ways which is why actual monitoring data and health assessments are preferable.

Thank you for considering these changes, and for doing the right thing by future generations. [DEQ](#) is in a position of great power, and great responsibility-- please seize it! I appreciate your service.

Sincerely,  
Kathleen Boylan  
Multnomah County

**From:** [Bryan Bennett](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Deq rule making  
**Date:** Thursday, October 12, 2023 6:33:16 PM  
**Attachments:** [Dear DEQ Team.docx](#)

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Please see attached letter thank you

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Thursday, October 12, 2023 6:43:00 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Velma Meares  
1437 S 10th Terrace  
Cornelius, OR 97113  
velmameares@gmail.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Thursday, October 12, 2023 6:46:52 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
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- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Teresa Haney  
4331 SE Bowman St  
Milwaukie, OR 97222  
tcbusen@gmail.com

From: [dmack33@comcast.net](mailto:dmack33@comcast.net)  
To: [Wendy@wv.gov](mailto:Wendy@wv.gov)  
Cc: [Wendy@wv.gov](mailto:Wendy@wv.gov)  
Subject: Climate Protection Program  
Date: Thursday, October 12, 2023 at 5:16 PM  
Attachments: Climate Protection Program received in court by Gwika Womacka The Onstream Oct 1, 2023.docx

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Re: Climate Protection Program received in testimony, submitted October 12, 2023  
From: Dale Fink

During the September 14, 2023 public hearing on Climate 2023 Realigning I made and public testimony. I said that at the EQC meeting in Newport September 14, 2023, Climate Action suggested that people watch DEQ's website to learn about the Best Available Emission Reduction (BAER) program. I did I noted that there are 14 facilities listed in here over 20,000 annual tons of CO<sub>2</sub> emissions. During my public testimony I said that fact has applied to DEQ to increase their Carbonless gas emissions from 97,000 tons per year which calculates to 1.5 tons per minute to 1,698,000 tons per year which calculates to 7 tons per minute. That would make West the largest greenhouse gas emitter in Oregon.

In 2012, three natural-gas-fired electricity producing plants greenhouse gas emissions range from 88,000 to 1,133 tons per year. Before it closed operating, the coal-fired Beattyville plant could emit 2,310,000 tons per year.

Of the 14 facilities subject to the Best Available Emission Reduction, only Amman's PEX. That Center has been called a PEX CO<sub>2</sub> emissions are about 97,000 tons per year. Note again that need is progressing in that Percentage of Significant Determination Application to DEQ to be allowed to emit 1,698,000 tons per year.

I said I read the Public comment received about Amman's Data Center, May 2023.

1. Oregon Legislatures
2. Climate Solutions
3. Green Energy Institute and Northwest Environmental Defense Center, a member of the 14-person Climate 2023 Realigning advisory Committee.

I said please act on the recommendations, and that 14 people serve on the Climate Realigning committee, and that only two people represent climate environmental organizations, the rest represent industry organizations, three environmental organizations are Climate Solutions, and Green Energy Institute. At the public hearing, a representative of one of those organizations provided detailed comment that encourage you to seriously consider, and please consider their written comments from the Oregon Legislative delegation, which includes input from Senators Jeff Merkley and Ron Wyden.

I also said that during Richard Whisman's leadership of the Department of Environmental Quality, he disbanded the DEQ Blue Ribbon Water Advisory Committee and the DEQ Air Toxic Advisory Committee because, from my point of view, any person who attended those meetings, was never trained with industry lobbyists. These committees were established with experts in Toxic Enforcement, epidemiology, EPA experience of present, etc. In other words, people who are not biased toward industry profits.

I said that I noted that the Climate Realigning Advisory Committee members were not a ratio of 12 to 2 in comparison, and that I was glad that Climate Solutions Green Energy, and other people join our climate testimony, even though that person had some input during the Climate Realigning Advisory Committee meetings.

To represent my public testimony after reading a error in the Oregonian by the reporter Gwika Womacka titled 'Climate-Change regulation challenged in court', in which it says with 'Students at Logan marched out of school March 2023 to protest NW Natural's effort to stop local identification efforts.' NW Natural and two other utilities, an industry group and a dozen other local trade organizations are now challenging the state's separate emissions reduction Climate Protection Program in court.

I encourage you use the best litigation attorneys at the Department of Justice who represents the DEQ and the Environmental Quality Commission to sue all the industry attorneys on this case.

See attachment titled 'Climate change regulation challenged in court by Gwika Womacka The Oregonian Oct. 1, 2023.docx'

Respectfully submitted,

Dale Fink, ELD  
dmack33@comcast.net  
Cell: 803-504-9372

1. Chair of Washington County Climate Action Network (WC CAN) - [dmack33@comcast.net](mailto:dmack33@comcast.net)

2. Project Director of Hillsboro Air & Water - [dmack33@comcast.net](mailto:dmack33@comcast.net)

\*\* Washington County Climate Action Network (WC CAN) is a coalition of grassroots advocates (individual and groups) dedicated to improve quality of life in Washington County by promoting healthy and sustainable communities, social and economic justice, and open and responsive government.

dmack33@comcast.net

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Thursday, October 12, 2023 7:07:31 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Glen Zulaski  
1700 N. Libra Street  
Newberg, OR 97132  
zulaskidm@yahoo.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Thursday, October 12, 2023 7:34:14 PM

---

Dear Nicole Singh,

As an Earthling and Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. DEQ should not place geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Different parts of our country have unique environmental advantages and have something to offer this global problem. Carbon dioxide does not stop at the state border; nor should our solutions.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Tom Chau  
10795 NW Reeves St  
Portland, OR 97229  
Tchau15@yahoo.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Thursday, October 12, 2023 7:54:43 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Steve Blum  
2023 Del Rio Ave SE  
Albany, OR 97322  
[steveblum@comcast.net](mailto:steveblum@comcast.net)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Thursday, October 12, 2023 8:36:40 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Craig Arnold  
224 NW 117th Loop  
Portland, OR 97229  
pimpride86@yahoo.com

**From:** [Lilly Hankins](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Thursday, October 12, 2023 8:49:48 PM

---

You don't often get email from [lilly.hankins@gmail.com](mailto:lilly.hankins@gmail.com). [Learn why this is important](#)

Dear Chair George, Vice Chair Baraso, and members of the Commission:

My name is Lilly Hankins and I am a volunteer with Families for Climate. I'm mother to a 7-year old daughter, and I'm writing this testimony because my primary job as her mom is to protect her from harm. Irreversible climate change gravely threatens her future and her chances of having a long and healthy life.

I'm grateful that Oregon has the Climate Protection Program; it is critical for Oregon to reduce our emissions as quickly as science says we need to. But I am concerned that DEQ's current proposed rules would undermine the effectiveness of the CPP and put the emissions reductions we desperately need out of our reach. Specifically, I'm concerned that the current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane offsets, which will slow the transition to non-emitting alternatives and will not deliver direct benefits to Oregonians. I am also concerned that the rules will allow new industrial emitters to produce unrestricted climate pollution in our state.

I'm asking DEQ to please, on behalf of our children, implement this program as strongly as it is intended. Please make the following changes to the rulemaking:

- Restrict biomethane (aka renewable natural gas (RNG) and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians. The stated goals of the CPP are to reduce greenhouse gas emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers, and out-of-state offsets accomplish none of those goals.
- Strengthen emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction (BAER) program. As the only existing state regulation on major industrial emitters, it is vital that the CPP works to ensure science-based emissions reductions from existing stationary sources and deter development of new stationary sources in Oregon. Given Oregon's growing industrial sector, it is especially critical that DEQ use this rulemaking to strengthen the integrity of the BAER program. Large industrial emitters must be held accountable for their climate pollution.

Oregon families need the Climate Protection Program to live up to its name. Please strengthen the rules so it can protect our children's future, not corporate profits.

Thank you for the opportunity to comment on this rulemaking.

Respectfully,

Lilly Hankins  
Portland, OR

**From:** [annie](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Greenhouse Gas Reporting Program  
**Date:** Thursday, October 12, 2023 8:53:37 PM

---

You don't often get email from [cabeckstany@gmail.com](mailto:cabeckstany@gmail.com). [Learn why this is important](#)

Your mission statement says it all, you are supposed to be "[maintaining and enhancing the quality of Oregon's air, land and water](#)" How do you do that if you write rules that give industry all the power? In case you haven't notice, we are in a worsening climate crisis and we got here BECAUSE of the free hand we have given industry. Please do the work you are supposed to do, the work that Oregonians want: protect our air and water and uphold the Climate Protection Plan.

Thus, I ask that you amend the proposed rules in the following ways:

1. Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon. Biomass derived fuels should not be allowed exemptions.
2. Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon. Unfortunately, since the adoption of the final CPP rules in 2021, increasing emissions from Oregon's industrial sector has become a reality when we should be holding polluters responsible for decreasing emissions.
3. Maintaining protective restrictions on methane and biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from anthropogenic carbon sources does not comply with the CPP.
4. Including export and transport facilities in emission reduction and reporting standards. Export facilities should have to list their final destinations. While they may utilize devices to reduce emissions during pumping phases, the open venting of railroad cars to reduce sparking must also be taken under consideration as should potential leakage during storage, transportation, and transfers. Any substantive change of site use should require a new Air Contaminant Discharge Permit (ACDP) or Title V permitting instead of being allowed to operate under old permits. Export facilities add to overall global emissions which affect us all in terms of climate chaos.
5. Biofuels and other so-called renewable fuels should not only be reporting on feedstocks and production methodologies, but also on the fuels used for hydrogenation, esterification or other processing to adequately access the true Carbon intensity numbers. Reporting should also include the land change values necessary to determine what other crops the land could have produced for human consumption as well as associated transportation and fertilizer emissions, and the like for a full picture. Carbon intensity modeling is problematic in numerous ways which is why actual monitoring data and health assessments are preferable.

Thank you.

annie capestany

97202

**From:** [ray seidler](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** CPP and the RAC  
**Date:** Thursday, October 12, 2023 9:28:32 PM  
**Attachments:** [IN DEFENCE OF THE OREGON CLIMATE PROTECTION PROGRAM.docx](#)

---

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**Nicole Singh and Elizabeth Elbel**

**Please see attached file with letter.**

**Ray Seidler**

**From:** [Greg Alderson](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** PGE comments on DEQ Climate 2023 Rulemaking  
**Date:** Thursday, October 12, 2023 9:32:31 PM  
**Attachments:** [image001.png](#)  
[PGEComments\\_DEQClimate2023Rules.pdf](#)

---

You don't often get email from gregory.alderson@pgn.com. [Learn why this is important](#)

Please see attached comments from PGE on the 2023 Climate Rulemaking.



**Greg Alderson**

Government Affairs and Environmental Policy | 303.524.5287  
portlandgeneral.com | Follow us on social @PortlandGeneral

**An Oregon kind of energy**

**From:** [holisticcooke@aol.com](mailto:holisticcooke@aol.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Comments on DEQ climate 2023 rulemaking  
**Date:** Thursday, October 12, 2023 10:04:13 PM

---

You don't often get email from [holisticcooke@aol.com](mailto:holisticcooke@aol.com). [Learn why this is important](#)

Dear DEQ,

Given the short timeframe global scientists say we have to reduce emissions in half by 2025, DEQ climate rules MUST be as strong as possible. I'm disappointed then, to see that the DEQ is following a safe "status quo" path, rather than taking the strongest possible action.

Below are specific requests :

1. Restrict biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians. Biomass derived fuels should not be allowed exemptions.
2. Strengthen emissions reduction requirements for new or expanded large stationary source facilities in Oregon, and hold polluters responsible for decreasing emissions.
3. Maintain protective restrictions on methane and biomethane accounting, including that synthetic methane derived from anthropogenic carbon sources does not comply with the CPP.
4. Include export and transport facilities in emission reduction and reporting standards. Export facilities should have to list their final destinations. While they may utilize devices to reduce emissions during pumping phases, the open venting of railroad cars to reduce sparking must also be taken under consideration as should potential leakage during storage, transportation, and transfers. Any substantive change of site use should require a new Air Contaminant Discharge Permit (ACDP) or Title V permitting instead of being allowed to operate under old permits. Export facilities add to overall global emissions which affect us all in terms of climate chaos.
5. Biofuels and other so-called renewable fuels should not only be reporting on feedstocks and production methodologies, but also on the fuels used for hydrogenation, esterification or other processing to adequately assess the true Carbon intensity numbers. Reporting should also include the land change values necessary to determine what other crops the land could have produced for human consumption as well as associated transportation and fertilizer emissions, Carbon intensity modeling is problematic which is why actual monitoring data and health assessments are preferable.

DEQ is in a position of power, and responsibility--

Thank you for considering and making meaningful acts.

sincerely,  
Harriet Cooke  
97219

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Friday, October 13, 2023 5:37:05 AM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Robert Ray  
6543 Doral Dr SE  
Salem, OR 97306  
bobray52@comcast.net

**From:** Laurie Dougherty <campaigns@good.do>  
**Sent:** Friday, October 13, 2023 5:46 AM  
**To:** 2023 Climate \* DEQ  
**Subject:** Strengthen the proposed 2023 climate rules

Department of Environmental Quality staff,

Thank you for the opportunity to provide comment on DEQ's 2023 climate rulemaking.

I have followed the development of Oregon's Climate Protection Program (CPP) since its beginning. The CPP must live up to its name as a program to protect the climate. This rulemaking will have far-reaching consequences for the climate and communities in Oregon.

By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon. However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts on communities and the climate are not sufficiently considered.

I am concerned that DEQ's current proposed rules would effectively undermine the CPP– a program that is absolutely essential to achieving our state's climate pollution reduction goals, and which was adopted with overwhelming public support following an extensive 18-month rulemaking and stakeholder engagement process. Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state. I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon; and
- 2) Disallowing hydrogen to count for CPP compliance unless DEQ ensures it is green electrolytic hydrogen, since other hydrogen sources and types are far more polluting and carry a host of risks for our energy system; and
- 3) Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction program.

Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Yours sincerely,  
Laurie Dougherty

---

This email was sent by Laurie Dougherty via Do Gooder, a website that allows people to contact you regarding issues they consider important. In accordance with web protocol RFC 3834 we have set the FROM field of this email to our generic no-reply address at campaigns@good.do, however Laurie provided an email address (lauriedougherty@gmail.com) which we included in the REPLY-TO field.

Please reply to Laurie Dougherty at lauriedougherty@gmail.com.

To learn more about Do Gooder visit

<https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.dogooder.co%2F&data=05%7C01%7CClimate.2023%40stateoforegon.mail.onmicrosoft.com%7C109c67bdf76e4f08c4c708dbcbea69dd%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C638327979880345980%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6I1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=yqYbczKwubx74aFpgrxfDPsSv29pr1oSmCpgTclu0xs%3D&reserved=0>

To learn more about web protocol RFC 3834 visit:

<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Ftools.ietf.org%2Fhtml%2Frfc3834&data=05%7C01%7CClimate.2023%40stateoforegon.mail.onmicrosoft.com%7C109c67bdf76e4f08c4c708dbcbea69dd%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C638327979880345980%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6I1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=Ff2fnpHaMPkWTC7W51cglP0GKapjDKgoR786U4rbPyc%3D&reserved=0>

**From:** [Keith Lucht](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** DEQ Public Comment on 2023 Climate Rulemaking  
**Date:** Friday, October 13, 2023 6:33:16 AM  
**Attachments:** [DEQ Public Comment on 2023 Climate Rulemaking.pdf](#)

---

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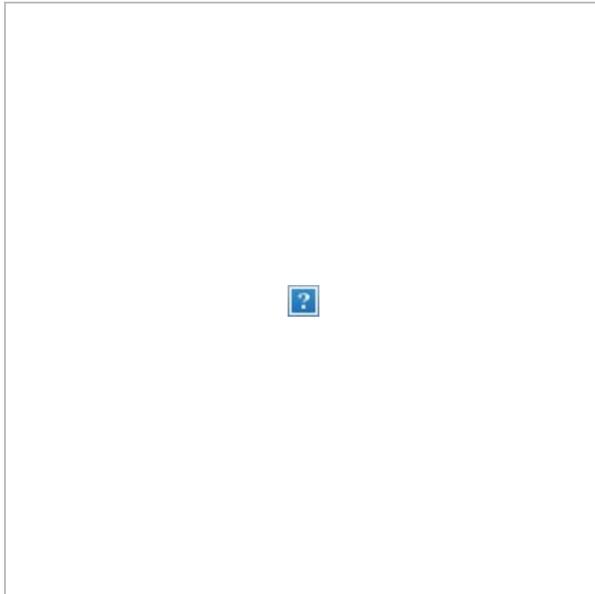
Good afternoon DEQ Team,

Our goal is to give comments about how important fossil fuels are for the state of Oregon and emphasize to them that until there is a viable replacement, we can't afford to continue outlawing fossil fuels. We are already promoting "greener" energies such as biodiesel and renewable diesel only to be told by the climate activists that even those energies are not "green" enough.

Please see the attached letter.

Very Respectfully,

**Keith Lucht**  
**DOT Compliance Manager**  
**Ed Staub & Sons Petroleum / Eds Trucking**  
**Cell: 541-887-7200**  
**Fax: 541-887-8575**  
[keith.lucht@edstaub.com](mailto:keith.lucht@edstaub.com)  
[www.edstaub.com](http://www.edstaub.com)



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**From:** [Darin Kandra](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Climate Change Rule Making  
**Date:** Friday, October 13, 2023 6:44:28 AM  
**Attachments:** [Dear DEQ Team.docx](#)

---

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Dear DEQ Team

Please read the attached letter about climate change and the proposed rule changes.

There is no way this country can function without the use of petroleum-based energy. I challenge anyone to look around, in your house, outside of your house and anywhere really, and find anything that is not tied to petroleum-based energy in one way or another.

**Darin Kandra**

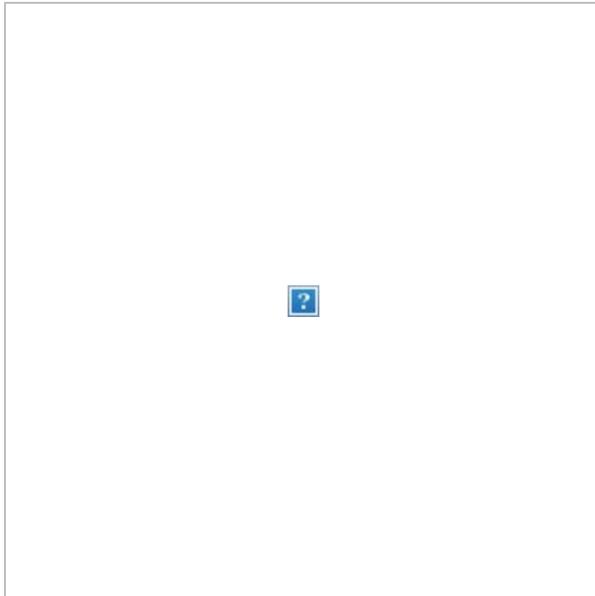
**IS Technician**

**Ed Staub & Sons Petroleum**

**541-887-8965**

[darin.kandra@edstaub.com](mailto:darin.kandra@edstaub.com)

[www.edstaub.com](http://www.edstaub.com)



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**From:** [Matt Howard](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** fuel  
**Date:** Friday, October 13, 2023 6:56:50 AM

---

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fossil fuels are still essential to everyday life in this country phasing out fossil fuels at this time is economic suicide.

**From:** [Paul Vogel](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Submitted questions and comments re: 2023 Climate Rulemaking  
**Date:** Friday, October 13, 2023 6:58:21 AM  
**Attachments:** [Outlook-w55cl22g.png](#)  
[Columbia Economic Team Questions & Comments on 2023 Climate Rulemaking.pdf](#)

---

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Submitted for consideration and response.

Thank you.

Paul Vogel

**Paul Vogel**  
Executive Director



M: 503.805.5139

[paulvogel@columbiacountyoregon.com](mailto:paulvogel@columbiacountyoregon.com)

[columbiaeconomicteam.com](http://columbiaeconomicteam.com)

**From:** [greg@hdlogos.com](mailto:greg@hdlogos.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** DEQ 2023 Proposed Rulemaking on Bio Methane, Lookback & Book and Claim.  
**Date:** Friday, October 13, 2023 7:02:47 AM  
**Attachments:** [A Plea for Fair Consideration.docx](#)

---

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See attached for my companies request.

Thanks

Greg



*Greg and Taylor Glassow*

**Owners**

[greg@hdlogos.com](mailto:greg@hdlogos.com) | 541.891.6272

[taylor@hdlogos.com](mailto:taylor@hdlogos.com) | 541.205.2887



**HIGH DESERT**  
PROMOTIONS & PRINTING

**From:** [Keith Martin](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Comment on DEQ 2023 Climate Rulemaking  
**Date:** Friday, October 13, 2023 7:29:38 AM  
**Attachments:** [1611\\_001.pdf](#)

---

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Please see attached comments.

**B. Keith Martin**

**Keith Martin**

Assistant Manager, Redmond

Ed Staub & Sons

(541) 815-7813 (mobile)

----- Forwarded message -----

**From:** **Redmond** <[esssmtp@edstaub.com](mailto:esssmtp@edstaub.com)>

**Date:** Fri, Oct 13, 2023 at 7:26 AM

**Subject:** Attached Image

**To:** Keith Martin <[keith.martin@edstaub.com](mailto:keith.martin@edstaub.com)>

**From:** [Corky Collier](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** climate rulemaking comments  
**Date:** Friday, October 13, 2023 8:07:14 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[DEQ Climate Rulemaking for natural gas.pdf](#)

---

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Please accept our comments on DEQ climate rulemaking.

Thanks,

Corky



Corky Collier  
Executive Director  
[Corky@CCA.works](mailto:Corky@CCA.works)  
PO Box 55651, Portland OR 97238  
503.287.8686 (o); 503.241.1888 (m)

**From:** [Steven Harper](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Letter of Concern  
**Date:** Friday, October 13, 2023 8:20:52 AM  
**Attachments:** [DEQ Letter.pdf](#)

---

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To whom it concerns...

Thank you

--

**Steve Harper**

**From:** [jimmy.martini](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Rulemaking  
**Date:** Friday, October 13, 2023 8:23:55 AM  
**Attachments:** [DEQ Climate 2023 Rulemaking Comment.docx](#)

---

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Thanks,  
Jimmy Martini  
Bridge Town Market  
Lowell, OR

**From:** [Moerlins, Mary](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** NW Natural Comments: 2023 Climate Rulemaking  
**Date:** Friday, October 13, 2023 8:24:48 AM  
**Attachments:** [DEQ Climate 2023 Proposed Rulemaking Comments - NW Natural.pdf](#)

---

You don't often get email from mary.moerlins@nwnatural.com. [Learn why this is important](#)

Elizabeth and Nicole,

Please find NW Natural's comments for the 2023 Climate Rulemaking attached. We appreciate the opportunity to submit our feedback as well as the opportunity to participate in the rules advisory committee.

Thank you,

Mary

**Mary Moerlins** (she, her)  
NW Natural – Director of Environmental Policy & Corporate Responsibility  
503.610.7655 m: 404-993-8273  
[www.nwnatural.com](http://www.nwnatural.com) [www.lesswecan.com](http://www.lesswecan.com)

Learn more about who we are and what we value by reading our [ESG Report](#)  
Find out about our Vision 2050 by reading [this report](#)  
[NW Natural Holdings](#) – Recognized as one of the 2023 World's Most Ethical Companies®

**From:** [Christa Nelson](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** DEQ Public Comment on 2023 Climate Rulemaking  
**Date:** Friday, October 13, 2023 8:35:02 AM

---

You don't often get email from [christa.nelson@edstaub.com](mailto:christa.nelson@edstaub.com). [Learn why this is important](#)

Dear DEQ Team,

I want to share my concerns and thoughts about the proposed changes to the Climate 2023 Rulemaking

by DEQ. These changes involve Bio-Methane regulation, Book and Claim accounting, commercial

Hydrogen, and the "Lookback" for Covered Entities.

First, it's essential to understand that petroleum-based energy, despite criticism, plays a vital role in

Oregon's economy. It not only provides energy, but also contributes to economic development and job

creation. We should consider the benefits and potential costs of all energy choices, especially in terms of

economic impact and human well-being.

During a recent DEQ climate Rulemaking Public Hearing on September 18th, it became clear that some

groups have reservations about allowing covered entities in Oregon to use book and claim accounting

for Bio-Methane from other states. However, these groups seem to support the use of electric vehicles

made outside Oregon and the importation of out-of-state electricity, even without direct economic

benefits to our citizens. This creates a difference in standards between Bio-Methane and out-of-state

electricity.

We urge DEQ to maintain the current regulations for Bio-Methane without further changes.

Book and

claim accounting has worked well for using out-of-state Bio-Methane in Oregon's electricity generation.

Changing these rules could lead to higher electricity costs, impacting consumers, including those in

environmental justice communities. To minimize costs and achieve equity, DEQ should refrain from

altering existing regulations. Technological advancements can help with CO2 levels, but economic

distress from hasty rule changes cannot be easily reversed.

We believe Bio-Methane should not be subject to geographical constraints for book and claim reporting.

There should be no requirements to inject Bio-Methane into an Oregon natural gas pipeline, no

restrictions on vintage use for greenhouse gas reporting, and no time constraints. Bio-Methane should

be allowed to be claimed and delivered to end-users in Oregon, even if it displaces natural gas used in a

connected pipeline.

The book and claim regulations established by DEQ at the start of the Greenhouse Gas Reporting program should remain unchanged. They strike a balance between environmental concerns and our state's energy infrastructure needs.

Hydrogen, especially "Gray" and "Blue" Hydrogen, is a lower emissions alternative worth considering.

Electric vehicles, while promoted as environmentally friendly, are not entirely carbon neutral, and their production outside Oregon doesn't benefit our state's economy. We must consider the entire lifecycle and make informed decisions.

Altering book and claim rules could lead to an energy crisis in Oregon, impacting citizens and energy stability. We believe a one-year lookback period should be incorporated into the regulations to benefit all covered entities.

Thank you for your commitment to responsible governance and reliable energy stewardship.

Sincerely,

**Christa Nelson**

**C-Store Manager**

**Redwood Hwy Market**

**541-592-5250**

**[christa.nelson@edstaub.com](mailto:christa.nelson@edstaub.com)**

[www.myfastbreak.com](http://www.myfastbreak.com)



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**From:** [Deborah.Meeks@shell.com](mailto:Deborah.Meeks@shell.com)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment - OR Climate 2023 Rulemaking  
**Date:** Friday, October 13, 2023 8:41:15 AM  
**Attachments:** [image001.png](#)  
[Shell Comment Letter Final.pdf](#)

---

You don't often get email from [deborah.meeks@shell.com](mailto:deborah.meeks@shell.com). [Learn why this is important](#)

Please find attached Shell USA comments regarding Oregon's Climate 2023 Rulemaking.

Regards,  
Debbie



Deborah C Meeks  
Manager – US West Coast Policy and Business Coordination  
Shell USA  
(510) 501-0438 – Cell  
[deborah.meeks@shell.com](mailto:deborah.meeks@shell.com)

**From:** [Ann Turner](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Friday, October 13, 2023 8:50:15 AM

---

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Chair George, Vice Chair Baraso, and Members of the Environmental Quality Commission,

Thank you for the opportunity to submit comments on DEQ's proposed rules for the Climate Protection Program (CPP), a program critical to Oregon's climate goals. My name is Dr. Ann Turner. I am a member of Oregon Physicians for Social Responsibility's Healthy Climate Action Team, 350PDX's Fossil Fuel Resistance Team, and the St. Andrew Catholic Church Ecojustice Team. I retired from a career in community health as a physician and as medical director at Virginia Garcia Memorial Health Center. I worked with some of the most vulnerable in our community—low income, minority, non-English speaking adults and families, including migrant and seasonal farmworkers, populations most likely to suffer from the devastating impacts of climate warming. The importance of climate justice cannot be overstated.

The Climate Protection Program is broadly supported by Oregonians and is critical to Oregon's meeting its climate goals. Its effectiveness relies on DEQ's rules administering the program. As a physician worried about the health of our communities, I am deeply concerned about DEQ's newly proposed rules about biomethane and about emissions from the expansion of large industrial sites. The Climate Protection Program is designed to reduce greenhouse gas emissions and air pollutants but DEQ's proposed rules may actually increase emissions.

With regard to biomethane, allowing gas utilities to use out-of-state biomethane investments, does nothing to benefit Oregonians. DEQ must require that both biomethane and hydrogen be generated and used in Oregon to be used for CPP compliance.

I also urge DEQ to strengthen its emissions reduction requirements for new or expanded large stationary sources in Oregon. It is disturbing that DEQ is still utilizing old AP-42 standards written by the oil industry with self-reporting based on the BAER survey. This methodology has been shown to vastly underestimate emissions by up to 59% and for the Climate Protection Plan to realistically address emission reductions is fully insufficient. Other states utilize the preferred new standards of EPA methods 204 and 325 to replace company guestimates with actual air quality monitoring DATA, emissions inventories, and health assessments. Oregon DEQ should put an end to industry guestimate self-reporting through an industry-stacked methodology.

The reality is that since the final CPP rules were adopted in 2021, emissions have increased not decreased from our industrial sector. As an example, if Amazon's permits are approved for expanding their operations in Eastern Oregon, powered by gas, their data centers will result in huge increases in pollutants, including greenhouse gas emissions, in vulnerable communities. In addition, the 2023 legislature adopted "Oregon CHIPS Act" that will increase the number of large manufacturing plants and, inevitably, GHG emissions. I strongly urge DEQ to strengthen its rules for large industrial facilities.

Biofuels and other so-called renewable fuels should not only be reporting on feedstocks and production methodologies, but also on the fuels used for hydrogenation, esterification or other processing to adequately access the true Carbon Intensity numbers. Reporting should also include the land change values necessary to determine what other crops the land could have produced for human consumption as well as associated transportation and fertilizer emissions, and the like for a full picture. Carbon intensity modeling is complex which is why actual monitoring data and health assessments are preferable.

The climate clock is running out. DEQ has the authority and the moral responsibility to act to protect the health and safety of Oregonians **now** and must not be swayed by industry's demands for rules that increase their profits while destroying our health. Thank you for

considering my comments.

Ann Turner, MD

2007 NE Mason St.

Portland, OR 97211

**From:** [Derek Gendvil](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Friday, October 13, 2023 8:57:50 AM

---

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Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

However, I was disappointed to hear that the recent rule-making table did not include community input, and also that the results lacked in meeting the plan's original goals of reducing greenhouse gas emissions by 50%, providing meaningful investments to benefit Oregonians, and holding big polluters accountable.

Therefore, I am calling on the DEQ to adapt the rules for CPP implementation to focus on the original goals of:

- 1) Reducing greenhouse gas emissions and other air pollutants, maximizing public health benefits, and minimizing costs for consumers in environmental justice and other communities in Oregon.
- 2) Keeping economic and health benefits of the Community Climate Investment program in Oregon: investments should materially benefit Oregonians at the frontlines of pollution and the climate crisis, rather than paying for cheap offsets in other places.
- 3) Achieving real reduction of emissions by 50%, rather than allowing companies to invest in biomass-derived fuels such as "renewable natural gas" (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
- 4) Holding big polluters accountable to engage in science-based "best available emissions reductions" (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.
- 5) Returning the date for a "new source" of stationary pollution to December 31, 2021.

The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
Derek Gendvil  
9030 W. Sahara Ave. #360  
Las Vegas, NV 89117

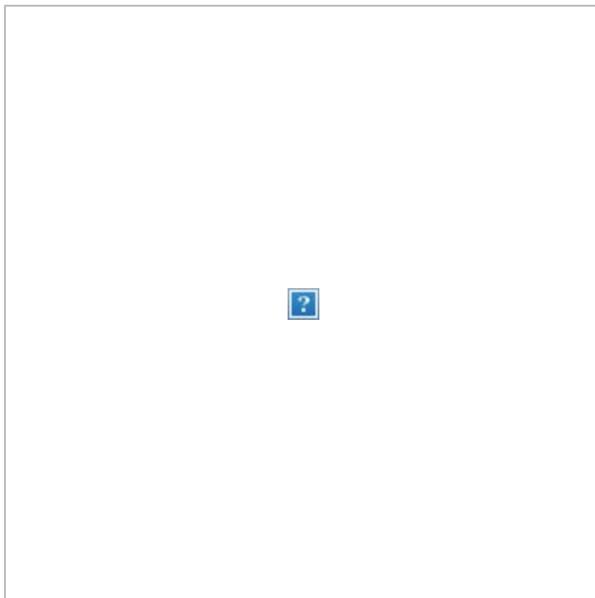
**From:** [Sturdy Sturdevant](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Date:** Friday, October 13, 2023 9:04:15 AM

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Hello you talk about replacing fossil fuels or doing away with them here's the problem you have no back up solutions solutions that you present us with don't work you're making environmentally friendly fuel that doesn't work at all the other deal is with heating oil do you want this on your conscience people freezing to death because they don't have no heat yeah maybe 2030 maybe 40 maybe 50 years you might be fossil fuel free but I doubt it because you're always going to need some kind of fossil fuel trying to save the environment which is not really working yeah the other countries that are producing emissions we're tied into these other countries we all know that we need rules and regulations but when you take it to the extreme that's where I draw the line the stuff you're putting on us is nonsense the electrical get grids are going to be forced with brown out black out and everything else we have no infrastructure in place to build nuclear plants to produce clean energy and by forcing the petroleum business out of business revenue that will be lost will be devastating where does the nonsense end and reality begin thank you for your time and have a nice day--

**William Sturdevant**  
**Fuel Delivery Driver**  
**Bend**  
**541-330-8356**  
[william.sturdevant@edstaub.com](mailto:william.sturdevant@edstaub.com)  
[www.edstaub.com](http://www.edstaub.com)



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**From:** [Farrell Fox](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Keep Energy Costs Low  
**Date:** Friday, October 13, 2023 9:10:06 AM

---

Dear Climate DEQ,

Let's not be stupid about this

As an Oregonian, I'm concerned about bearing the costs of the Climate Protection Program. I am concerned that some extremists are trying to take away my energy choice.

With historically high inflation and low-income communities usually suffering the brunt of high utility bills, I urge you to continue to keep our energy costs low. Please do not place geographic limitation on renewables such as renewable natural gas because more opportunities for developing RNG will increase supply and drive costs down for everyone.

Arbitrary geographic boundaries for RNG would be the same as excluding wind and solar resources from outside of Oregon.

Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.

Arbitrary in-state boundaries don't make any sense and will harm Oregonians at the pump and in their household.

Please confirm that DEQ will remove the geographic limitation on RNG and preserve all decarbonization options to keep costs down.

Thank you for your consideration,

Sincerely,

Farrell Fox  
53742 Rosa Rd  
Bandon, OR 97411  
ffoxq@msn.com

**From:** [Kathy Temple](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** DEQ Public Comment on 2023 Climate Rulemaking  
**Date:** Friday, October 13, 2023 9:15:54 AM

---

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Dear DEQ Team,

I want to share my concerns and thoughts about the proposed changes to the Climate 2023 Rulemaking

by DEQ. These changes involve Bio-Methane regulation, Book and Claim accounting, commercial

Hydrogen, and the "Lookback" for Covered Entities.

First, it's essential to understand that petroleum-based energy, despite criticism, plays a vital role in Oregon's economy.

It not only provides energy but also contributes to economic development and job creation. We should consider the benefits and potential costs of all energy choices, especially in terms of

economic impact and human well-being.

During a recent DEQ climate Rulemaking Public Hearing on September 18th, it became clear that some

groups have reservations about allowing covered entities in Oregon to use book and claim accounting

for Bio-Methane from other states. However, these groups seem to support the use of electric vehicles

made outside Oregon and the importation of out-of-state electricity, even without direct economic

benefits to our citizens. This creates a difference in standards between Bio-Methane and out-of-state

electricity.

We urge DEQ to maintain the current regulations for Bio-Methane without further changes.

Book and

claim accounting has worked well for using out-of-state Bio-Methane in Oregon's electricity generation.

Changing these rules could lead to higher electricity costs, impacting consumers, including those in

environmental justice communities. To minimize costs and achieve equity, DEQ should refrain from

altering existing regulations. Technological advancements can help with CO2 levels, but economic

distress from hasty rule changes cannot be easily reversed.

We believe Bio-Methane should not be subject to geographical constraints for book and claim reporting.

There should be no requirements to inject Bio-Methane into an Oregon natural gas pipeline, no

restrictions on vintage use for greenhouse gas reporting, and no time constraints. Bio-Methane should

be allowed to be claimed and delivered to end-users in Oregon, even if it displaces natural gas used in a

connected pipeline.

The book and claim regulations established by DEQ at the start of the Greenhouse Gas

## Reporting

program should remain unchanged. They strike a balance between environmental concerns and our state's energy infrastructure needs.

Hydrogen, especially "Gray" and "Blue" Hydrogen, is a lower emissions alternative worth considering.

Electric vehicles, while promoted as environmentally friendly, are not entirely carbon neutral, and their

production outside Oregon doesn't benefit our state's economy. We must consider the entire lifecycle

and make informed decisions.

Altering book and claim rules could lead to an energy crisis in Oregon, impacting citizens and energy

stability. We believe a one-year lookback period should be incorporated into the regulations to benefit

all covered entities.

Thank you for your commitment to responsible governance and reliable energy stewardship.

**Kathy Temple**

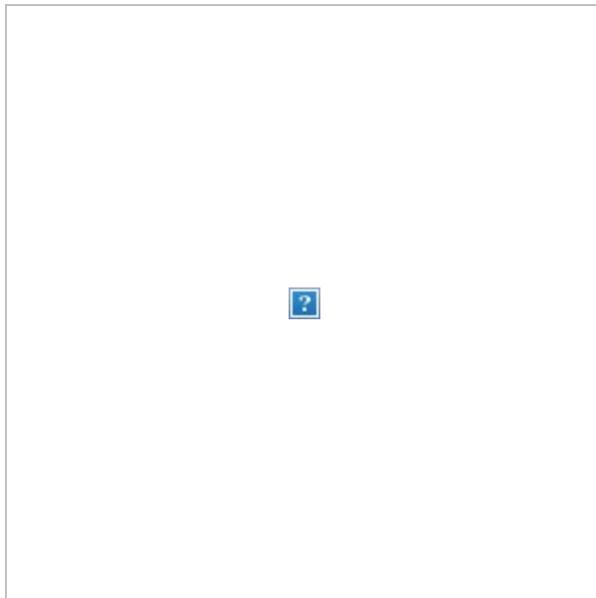
**Regional Sales Manager**

**Office: 541-330-8356**

**Mobile: 541-408-5155**

**[kathy.temple@edstaub.com](mailto:kathy.temple@edstaub.com)**

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**From:** [Marisa Blackshire](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Climate 2023  
**Date:** Friday, October 13, 2023 9:21:21 AM  
**Attachments:** [image003.png](#)  
[ODEQ 10-13-23.pdf](#)

---

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Attached are Bloom Energy's comments on the proposed rulemaking.

Thanks in advance for your consideration!

**Marisa Blackshire**

Vice President, Environment and Regulatory Law

**Bloomenergy**

4353 North First Street,  
San Jose, CA 95134

[www.bloomenergy.com](http://www.bloomenergy.com)

**E** [Marisa.Blackshire@bloomenergy.com](mailto:Marisa.Blackshire@bloomenergy.com)

**M** (805) 231-0912

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**From:** [Laura Nash](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** public comment on DEQ ruling for State Climate Protection Plan  
**Date:** Friday, October 13, 2023 9:54:23 AM

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We've run out of time. We don't have the luxury of giving industry any more leeway if we want to stave off climate catastrophe.

I strongly urge DEQ to amend the proposed rules by:

1. Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of “book and claim” accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon. Biomass derived fuels should not be allowed exemptions.
2. Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon. Unfortunately, since the adoption of the final CPP rules in 2021, increasing emissions from Oregon’s industrial sector has become a reality when we should be holding polluters responsible for decreasing emissions.
3. Maintaining protective restrictions on methane and biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from anthropogenic carbon sources does not comply with the CPP.
4. Including export and transport facilities in emission reduction and reporting standards. Export facilities should have to list their final destinations. While they may utilize devices to reduce emissions during pumping phases, the open venting of railroad cars to reduce sparking must also be taken under consideration as should potential leakage during storage, transportation, and transfers. Any substantive change of site use should require a new Air Contaminant Discharge Permit (ACDP) or Title V permitting instead of being allowed to operate under old permits. Export facilities add to overall global emissions which affect us all in terms of climate chaos.
5. Biofuels and other so-called renewable fuels should not only be reporting on feedstocks and production methodologies, but also on the fuels used for hydrogenation, esterification or other processing to adequately access the true Carbon intensity numbers. Reporting should also include the land change values necessary to determine what other crops the land could have produced for human consumption as well as associated transportation and fertilizer emissions, and the like for a full picture. Carbon intensity modeling is problematic in numerous ways which is why actual monitoring data and health assessments are preferable.

Thank you,  
Laura Nash

**From:** [Chris Wilson \(New York\)](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Electrochaea Comments Re: Proposed Permanent Rule Amendments to Chapter 340 of the Oregon Administrative Rules  
**Date:** Friday, October 13, 2023 11:20:36 AM  
**Attachments:** [EC Oregon Climate 2023 Comment Oct 13 2023.pdf](#)

---

You don't often get email from [chris.wilson@electrochaea.com](mailto:chris.wilson@electrochaea.com). [Learn why this is important](#)

Hello,

Attached please find Electrochaea's comments for the proposed permanent rule amendments to the Greenhouse Gas Reporting Program Division 215. We appreciate the opportunity to participate in this rulemaking process., and please reach out if you have any follow-up questions or comments.

Best regards,

**Chris Wilson**

Manager Global Sustainability

New York – Eastern Time

Electrochaea Corporation

+1.862.438.7116

[chris.wilson@electrochaea.com](mailto:chris.wilson@electrochaea.com)

Receive the latest news and updates from Electrochaea by following us on [LinkedIn](#).



**From:** [Ryan Vazza](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Cc:** [Drew Carlson](#)  
**Subject:** Rulemaking Comment - Climate Protection Program  
**Date:** Friday, October 13, 2023 11:41:33 AM  
**Attachments:** [image001.png](#)  
[Global Partners DEQ CPP Comments Final.docx](#)

---

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Attached are our comments on the Climate Protection Program – thanks.

Best,  
Ryan

## **Ryan Vazza**

Energy Policy Analyst  
Corporate Affairs and Sustainability Group

---

**C** 781-697-1777

Global Partners LP  
800 South Street, Suite 500  
Waltham, MA 02453  
[www.globalp.com](http://www.globalp.com)

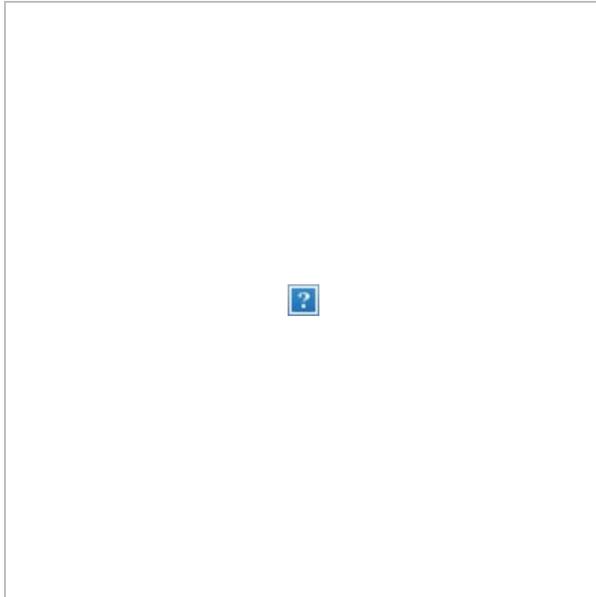


**From:** [Kristy Jensen](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Climate 2023  
**Date:** Friday, October 13, 2023 11:51:23 AM  
**Attachments:** [Document\\_20231013\\_0001.pdf](#)

---

You don't often get email from [kristy.jensen@edstaub.com](mailto:kristy.jensen@edstaub.com). [Learn why this is important](#)

**Kristy Jensen**  
**Fuel Accountant**  
**Bend**  
**Office: 541-330-8356**  
[\*\*kristy.jensen@edstaub.com\*\*](mailto:kristy.jensen@edstaub.com)  
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**From:** [Lena Prine](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Cc:** [Tom Hoffert](#)  
**Subject:** Rulemaking Comments  
**Date:** Friday, October 13, 2023 11:53:32 AM  
**Attachments:** [Outlook-ppahxmsz.png](#)  
[CCP Chamber Public Comment.pdf](#)

---

You don't often get email from [lena@saalemchamber.org](mailto:lena@saalemchamber.org). [Learn why this is important](#)

Please see the attached comments for consideration of the Climate 2023 proposed rules.

Yours sincerely,

**Lena Prine**

Director of Business Advocacy  
Salem Area Chamber of Commerce | 1110 Commercial St NE  
Office: 503-581-1466 x 310  
[lena@saalemchamber.org](mailto:lena@saalemchamber.org) | [saalemchamber.org](http://saalemchamber.org)



**Salem Chamber**  
Convener | Catalyst | Champion

<!--[if !vml]-->

<!--[endif]-->

**From:** [Teryn Yazdani](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Cc:** [Lisa Arkin](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Friday, October 13, 2023 12:02:31 PM  
**Attachments:** [Beyond Toxics DEQ Climate 2023 Rulemaking Comment.pdf](#)

---

Good afternoon,

Please accept these comments on behalf of Beyond Toxics regarding the 2023 Climate Rulemaking.

Please confirm receipt of this email at your earliest convenience.

Sincerely,  
Teryn Yazdani

--

**Teryn Yazdani** - *She/Her/Hers*  
**Staff Attorney & Climate Policy Manager**  
Beyond Toxics  
Tel: +1 541-543-2460  
Email: [tyzdani@beyondtoxics.org](mailto:tyzdani@beyondtoxics.org)

**From:** [Cheyenne Holliday](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Cc:** [Xitlali Torres](#)  
**Subject:** Please Strengthen Proposed 2023 Climate Rules  
**Date:** Friday, October 13, 2023 12:11:35 PM  
**Attachments:** [image001.png](#)  
[Verde Comments - DEQ 2023 Climate Rulemaking.pdf](#)

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You don't often get email from cheyneholliday@verdenw.org. [Learn why this is important](#)

Please see Verde's attached comments asking to strengthen the proposed 2023 climate rulemaking.

Thank you

---

**Cheyenne Holliday** (*she/her*)

Advocacy Manager of [Verde](#)

4145 NE Cully Blvd, Portland, OR 97218

Cell: (503) 545-7656

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**From:** [Mike Freese](#)  
**To:** [2023 Climate \\* DEQ](#); [Colin.McConnaha@state.or.us](mailto:Colin.McConnaha@state.or.us); [Nicole.Singh@state.or.us](mailto:Nicole.Singh@state.or.us)  
**Cc:** [Danelle Romain](#)  
**Subject:** OFA CPP Comments  
**Date:** Friday, October 13, 2023 12:11:40 PM  
**Attachments:** [OFA-CPP Proposed Rule Changes 2023.pdf](#)

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DEQ:

Please find attached the Oregon Fuels Association comments to DEQ's Proposed Rule Changes to the CPP. If you have any questions, please do not hesitate to contact me.

Best,

Mike Freese  
Romain Freese, LLC: Lawyers & Lobbyists  
T: (503)226-8090 • C: (503) 991-2785 • [RFlawlobby.com](http://RFlawlobby.com)

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**From:** [lynn.spitaleri.handlin](mailto:lynn.spitaleri.handlin)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Friday, October 13, 2023 12:33:42 PM

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Hi,

My name is Lynn Handlin and I live in Happy Valley Oregon and work in Portland. I have serious concerns that our climate protection rules are being weakened at a time when they need to be seriously strengthened. We do not have time to mess around with this to benefit big oil and methane and the like at the expense of a livable planet for my kids, and everyone else's kids. Climate change is here, but it is not too late to reduce the impacts so that our future generations at least have a chance. I see trees dying when they shouldn't, my child choking on smoke from extreme wildfires, family members impacted by extreme drought, and on and on.

You have a chance to make things better.

The environmental coalition I work with in Portland OR, primarily on the CEI HUB is very disturbed that DEQ is still utilizing old AP-42 standards written by the oil industry with self-reporting based on the BAER survey. This methodology has been shown to vastly underestimate the amount of emissions by up to 59% and for the Climate Protection Plan to realistically address emission reductions is fully insufficient. Other states utilize the preferred new standards of EPA methods 204 and 325 to replace company guestimates with actual air quality monitoring DATA, emissions inventories, and health assessments. Oregon DEQ should put an end to industry guestimate self-reporting through an industry-stacked methodology.

By undermining the integrity of the CPP, the current proposed rule amendments will severely compromise the program's intended public health, economic, and employment goals, and thereby hinder benefits for Oregon consumers, workers, local economies, and environmental justice communities across the state.

Specifically, I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate and air pollution in Oregon.

I do not understand why aviation fuels and biogenic fuels are also exempted from certain emission reporting requirements, for no particular reason. Also, there's a giant loophole where DEQ can "under unique situations", whatever that means, exempt industry from 3<sup>rd</sup> party verification.

Also, I have serious concerns about missing components to the CI value calculations not being listed "Under OAR 340-215-0042 or 340-272-0455 under the documentation required sections, biofuels and other so-called renewable fuels should not only report on feedstocks and production methodologies, but also on the fuels used for hydrogenation, esterification or other processing to adequately access the true Carbon intensity numbers.

There must be full transparency about the nature of the fuels including actual information about feedstocks, land use change, processing including what time frame is used to calculate CI of hydrogenation using methane, the shorter time frame of 20 years is much more important in terms of climate than the longer term 100 year time frame, methane is far more harmful in the early years. We do not have time for the 100 year time frame, and more. The rules must ensure that land being used now for growing food, or forest lands that are currently sequestering carbon are not to be used to grow stuff to burn for getting us around.

I do not agree with removing the phrase "additional documentation must be made available for verification upon request". Exporters and transporters of fuels should not be exempted and should have to list the final destination of the fuels(340-215-0115). There is no good reason for this, just more industry give aways. While they may utilize devices to reduce emissions during pumping phases, the open venting to reduce sparking must also be taken under consideration as should potential leakage from during storage and transfers. Any substantive change of use should require a new ACDP or Title V permitting instead of being allowed to operate under old permits.

I have real concerns about who is on this rule making committee, all but 2 of the people are industry representatives of one kind or another, only 2 people with organizations that are defending our environment and who care about environmental justice. That is not a good way to make rules, it's like having the COP led by oil company executives. Please listen to the environmental organizations.

Thank you

Lynn Handlin

**From:** [Cassandra Farrant](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Amp Comment Letter on the Climate 2023 Notice of Proposed Rulemaking  
**Date:** Friday, October 13, 2023 12:34:23 PM  
**Attachments:** [image001.png](#)  
[Amp OR CFS Comment Letter vF.pdf](#)

---

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Nichole and Elizabeth,

Attached, please find Amp's comment letter on the Climate 2023 Notice of Proposed Rulemaking: Appendix of Proposed Rulemaking. If you have any questions, we would be happy to discuss them with you.

Please confirm receipt and have a good weekend.

Thanks, Cassandra

--

**Cassandra Farrant**

Head of Environmental Credit Compliance



M: (562) 355-8444

O: (312) 300-6700 ext. 112

F: (312) 380-0206

[cfarrant@ampamericas.com](mailto:cfarrant@ampamericas.com)

2001 N. Clybourn Ave, Ste 400

Chicago, IL 60614

[ampamericas.com](http://ampamericas.com)

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**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Friday, October 13, 2023 12:41:13 PM

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Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Keith Tilton  
675, SW View Crest Drive  
Dundee, OR 97115  
keithetilt@aol.com

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Expand Renewable Energy Options  
**Date:** Friday, October 13, 2023 12:45:59 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about limitations for new renewable energy options in the Climate Protection Program. I urge DEQ to not include geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down. Please do not further increase costs and make this program less effective.

- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon and in fact may limit verifiable carbon reduction.
- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.

Please confirm that DEQ will not include arbitrary and ineffective geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please expand options for decarbonized fuels like renewable natural gas and ensure quantifiable carbon reductions occur as a result of this program.

Sincerely,  
Ramona Tilton  
675 SW View Crest Drive  
Dundee, OR 97115  
ramonatilt@aol.com

**From:** [Sam Lehr](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Re: RNGC Comments on Appendix of Proposed Rules - Climate 2023 Rulemaking  
**Date:** Friday, October 13, 2023 12:47:46 PM  
**Attachments:** [231013 Comments on Climate 2023 Rulemaking RNG Coalition.pdf](#)

---

You don't often get email from sam.lehr@rngcoalition.com. [Learn why this is important](#)

Please see attached, thanks!

**Sam Lehr**  
Manager of Sustainability and Markets Policy  
*Coalition for Renewable Natural Gas*

O: 916.588.3033  
C: 302.757.0866

---

**From:** Sam Lehr <sam.lehr@rngcoalition.com>  
**Date:** Friday, October 13, 2023 at 2:52 PM  
**To:** "Climate.2023@deq.oregon.gov" <Climate.2023@deq.oregon.gov>  
**Cc:** Sam Wade <sam@rngcoalition.com>  
**Subject:** RNGC Comments on Appendix of Proposed Rules - Climate 2023 Rulemaking

Good morning,

Please see attached comments from RNG Coalition in response to DEQ's draft Appendix of Proposed Rules under the Climate 2023 Rulemaking. We appreciate the continued opportunity to provide feedback.

Best regards,

Sam

**Sam Lehr**  
Manager of Sustainability and Markets Policy  
*Coalition for Renewable Natural Gas*

O: 916.588.3033  
C: 302.757.0866

**From:** [Cassidy](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** DEQ Public Comment on 2023 Climate Rulemaking  
**Date:** Friday, October 13, 2023 12:50:13 PM  
**Attachments:** [DEQ Team.docx](#)

---

You don't often get email from cassmartin31@gmail.com. [Learn why this is important](#)

Please see attached.

Thank you,  
Cassidy DeHague  
[cassmartin31@gmail.com](mailto:cassmartin31@gmail.com)

**From:** [Becky Atkinson](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Cc:** [Jessie Dzura](#)  
**Subject:** Comments on Oregon DEQ GGRP  
**Date:** Friday, October 13, 2023 1:01:40 PM  
**Attachments:** [Oregon DEQ Letter GreenGasUSA Oct 2023.pdf](#)

---

You don't often get email from becky.atkinson@greengasusa.com. [Learn why this is important](#)

Hello,

Please find attached our comments on the draft regulations related to the GGRP.

Please feel free to contact us with any questions.

Best,  
Becky

GreenGasUSA  
Becky Atkinson  
President  
Email: [becky.atkinson@greengasusa.com](mailto:becky.atkinson@greengasusa.com)  
4900 O'Hear Ave  
Suite 100  
North Charleston, SC 29405  
[www.greengasusa.com](http://www.greengasusa.com)  
c: 267-614-3555

**From:** [McDonald, Brian C.](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** MPC Comments to Climate 2023 Rulemaking  
**Date:** Friday, October 13, 2023 1:11:34 PM  
**Attachments:** [OR DEQ Comment Letter Climate 2023 Rulemaking.pdf](#)

---

You don't often get email from bmcDonald@marathonpetroleum.com. [Learn why this is important](#)

Please see attached comments. Contact me with any questions.

Regards,

Brian McDonald  
Marathon Petroleum Corporation | Corporate Environmental  
C: 310.872.4436  
O: 916.462.5063

**From:** [Pansare, Sourabh S](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment  
**Date:** Friday, October 13, 2023 1:14:18 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[2023 CPP Rulemaking Phillips 66 comment letter 10.13.2023.pdf](#)

---

You don't often get email from [sourabh.s.pansare@p66.com](mailto:sourabh.s.pansare@p66.com). [Learn why this is important](#)

**Dear Ms. Elbel and Ms. Singh,**

**On behalf of the Phillips 66 Company, I am submitting the attached comment letter in response to the Notice of Proposed Rulemaking – Climate 2023 Rulemaking. We thank OR DEQ for considering our comments.**

**Thank you.**

**Sourabh**



**Sourabh Pansare**  
**Climate Policy Advisor**

O: 832-765-1274 | M: 918-332-0927  
HQ-N672-02 | 2331 Citywest Blvd, Houston, TX 77042  
[Sourabh.s.pansare@p66.com](mailto:Sourabh.s.pansare@p66.com)



**From:** [Lee Moore](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** DEQ Rulemaking  
**Date:** Friday, October 13, 2023 1:18:42 PM

---

You don't often get email from lee.moore@edstaub.com. [Learn why this is important](#)

As a combat veteran who has deployed and worked around the world one of the advantages we have had as Americans is being partially energy dependent without high taxation and over bias regulation. Right now with the outbreaks of war in our world the last thing we need is more restrictions and rules on our fossil fuels industry. Higher gas prices and availability hurt our Veterans and service members who are on limited income as well as the rest of our great country who struggle every day to make ends meet.

Please think deeply about our state of Oregon, many of us live rural and do have to commute, run our farms and companies each day. Please do not put a strain on our wonderful state and its wonderful people.

I support this letter 100% below

Dear DEQ Team,

I want to share my concerns and thoughts about the proposed changes to the Climate 2023 Rulemaking by DEQ. These changes involve Bio-Methane regulation, Book and Claim accounting, commercial Hydrogen, and the "Lookback" for Covered Entities.

First, it's essential to understand that petroleum-based energy, despite criticism, plays a vital role in Oregon's economy. It not only provides energy but also contributes to economic development and job creation. We should consider the benefits and potential costs of all energy choices, especially in terms of economic impact and human well-being.

During a recent DEQ climate Rulemaking Public Hearing on September 18th, it became clear that some groups have reservations about allowing covered entities in Oregon to use book and claim accounting for Bio-Methane from other states. However, these groups seem to support the use of electric vehicles made outside Oregon and the importation of out-of-state electricity, even without direct economic benefits to our citizens. This creates a difference in standards between Bio-Methane and out-of-state electricity.

We urge DEQ to maintain the current regulations for Bio-Methane without further changes. Book and claim accounting has worked well for using out-of-state Bio-Methane in Oregon's electricity generation. Changing these rules could lead to higher electricity costs, impacting consumers, including those in environmental justice communities. To minimize costs and achieve equity, DEQ should refrain from altering existing regulations. Technological advancements can help with CO2 levels, but economic distress from hasty rule changes cannot be easily reversed.

We believe Bio-Methane should not be subject to geographical constraints for book and claim

reporting. There should be no requirements to inject Bio-Methane into an Oregon natural gas pipeline, no restrictions on vintage use for greenhouse gas reporting, and no time constraints. Bio-Methane should be allowed to be claimed and delivered to end-users in Oregon, even if it displaces natural gas used in a connected pipeline.

The book and claim regulations established by DEQ at the start of the Greenhouse Gas Reporting program should remain unchanged. They strike a balance between environmental concerns and our state's energy infrastructure needs.

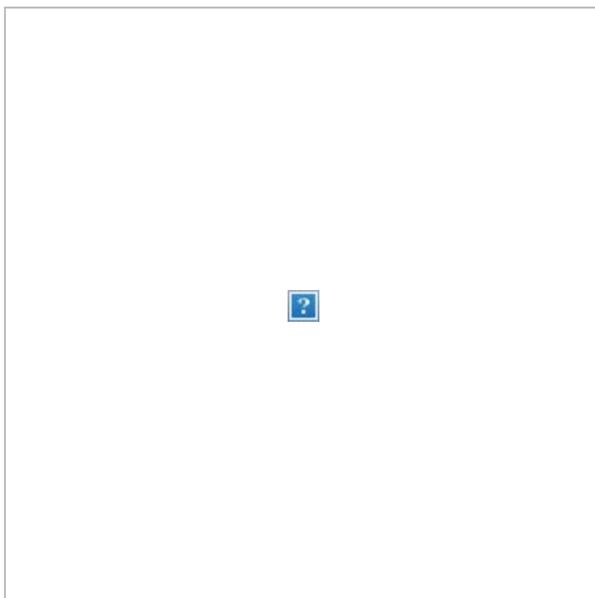
Hydrogen, especially "Gray" and "Blue" Hydrogen, is a lower emissions alternative worth considering. Electric vehicles, while promoted as environmentally friendly, are not entirely carbon neutral, and their production outside Oregon doesn't benefit our state's economy. We must consider the entire lifecycle and make informed decisions.

Altering book and claim rules could lead to an energy crisis in Oregon, impacting citizens and energy stability. We believe a one-year lookback period should be incorporated into the regulations to benefit all covered entities.

Thank you for your commitment to responsible governance and reliable energy stewardship.

Sincerely,

**Lee Moore**  
**Sales & Marketing Representative**  
**541-668-5827**  
[lee.moore@edstaub.com](mailto:lee.moore@edstaub.com)  
[www.edstaub.com](http://www.edstaub.com)



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**From:** [Alyssa Koomas](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Friday, October 13, 2023 1:23:12 PM

---

You don't often get email from akoomas@gmail.com. [Learn why this is important](#)

Chair George, Vice Chair Baraso, members of the Commission:

My name is Alyssa Koomas and I am a volunteer with Families for Climate. I am a parent to two young children. I am writing this testimony because as their parent, my most essential responsibility is to protect them from harm, and irreversible climate change gravely threatens their future, and the futures of all children in Oregon.

The Climate Protection Program is absolutely critical for Oregon to reduce our climate pollution on the urgent timeline dictated by current science. However, I am deeply concerned that the current proposed rules would undermine the effectiveness of the CPP, and put the necessary emissions reductions out of reach.

Specifically, I am worried that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane offsets, which will hinder the transition to non-emitting alternatives, while failing to deliver direct benefits to Oregonians. I am also worried that the rules as currently written will allow new industrial emitters to produce unrestricted climate pollution in Oregon.

I am asking DEQ to make the following important changes to the rulemaking:

1. **Restrict biomethane (aka renewable natural gas (RNG) and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians.** The stated goals of the CPP are to reduce greenhouse gas emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers, and out-of-state offsets accomplish none of those goals.
2. **Strengthen emissions reduction requirements for new or expanded large stationary source facilities in Oregon under the CPP's Best Available Emissions Reduction (BAER) program.** As the only existing state regulation on major industrial emitters, it is vital that the CPP works to ensure science-based emissions reductions from existing stationary sources and deter development of new stationary sources in Oregon. Given Oregon's growing industrial sector, it is especially critical that DEQ use this rulemaking to strengthen the integrity of the BAER program. Large industrial emitters must be held accountable for their climate pollution.

Oregon families need the Climate Protection Program to live up to its name. Please strengthen the rules so it can protect our children's future, not corporate profits.

Thank you for the opportunity to comment on this rulemaking.

Respectfully,

Alyssa Koomas

**From:** [Bob](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** anthropogenic greenhouse gas  
**Date:** Friday, October 13, 2023 1:28:21 PM

---

You don't often get email from bcsowdon@centurylink.net. [Learn why this is important](#)

A theory is not fact!

Global Warming is based on pure Theory!

Most of which has been debunked!

**Anthropogenic carbon dioxide can't be changing climate, because CO<sub>2</sub> is only a trace gas in the atmosphere and the amount produced by humans is dwarfed by the amount from volcanoes and other natural sources. Water vapor is by far the most important greenhouse gas, so changes in CO<sub>2</sub> are irrelevant.**

**The alleged "hockey stick" graph of temperatures over the past 1,600 years has been disproved. It doesn't even acknowledge the existence of a "medieval warm period" around a.d. 1000 that was hotter than today is. Therefore, global warming is a myth.**

**Global warming stopped in 1998; Earth has been cooling since then.**

**Climatologists conspire to hide the truth about global warming by locking away their data. Their so-called consensus on global warming is scientifically irrelevant because science isn't settled by popularity.**

**Climatologists have a vested interest in raising the alarm because it brings them money and prestige.**

Bob Sowdon

Woodburn, Oregon

**From:** [Sullivan, Michael](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Cc:** [Shahumyan, Zepure \(PacifiCorp\)](#); [Satkiewicz, Patty \(PacifiCorp\)](#); [Rogala, Zachary \(PacifiCorp\)](#)  
**Subject:** PacifiCorp's Climate 2023 Comments  
**Date:** Friday, October 13, 2023 1:32:24 PM  
**Attachments:** [OR DEQ Climate 2023 Comments 10 13 23.pdf](#)

---

You don't often get email from michael.sullivan@pacifiCorp.com. [Learn why this is important](#)

Good afternoon,

Please see PacifiCorp's comments on DEQ's Climate 2023 rulemaking update attached.

Best,  
Mike

Mike Sullivan  
*Pronouns: He/Him*  
Clean Energy Policy Advisor  
[Michael.Sullivan@PacifiCorp.com](mailto:Michael.Sullivan@PacifiCorp.com)



**From:** [Jackie White](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Cc:** [Chris McCabe](#)  
**Subject:** NWPPA Comments on Climate 2023 Rulemaking  
**Date:** Friday, October 13, 2023 1:34:03 PM  
**Attachments:** [NWPPA Comments on DEQ Climate 2023 Rulemaking.pdf](#)

---

You don't often get email from jackie@nwpulpaper.org. [Learn why this is important](#)

Dear Ms. Singh and Ms. Elbel,

Attached are comments from the Northwest Pulp & Paper Association (NWPPA) regarding DEQ's proposed Climate 2023 Rulemaking. Please let me know if you have any questions.

Thank you,

**Jackie White**

Director of Regulatory and Technical Affairs  
Northwest Pulp & Paper Association  
300 Deschutes Way S.W., Suite 201  
Tumwater, WA 98501  
(360) 529-8638 w  
(253) 549-6811 c  
[www.nwpulpaper.org](http://www.nwpulpaper.org)

**From:** [Hunter, Jeffrey \(Perkins Coie\)](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment  
**Date:** Friday, October 13, 2023 1:34:52 PM  
**Attachments:** [2023.10.13 Comments to DEQ CPP Rulemaking.pdf](#)

---

You don't often get email from [jhunter@perkinscoie.com](mailto:jhunter@perkinscoie.com). [Learn why this is important](#)

Hello Elizabeth and Nicole:

Happy Friday.

Please see the attached comments to the 2023 Climate Protection Plan rulemaking.

We appreciate DEQ's consideration of these comments.

Please let me know if you have any questions or cannot open the attachment.

Thanks.

**Jeffrey Hunter | Perkins Coie LLP**

PARTNER  
1120 N.W. Couch Street Tenth Floor  
Portland, OR 97209-4128  
D. +1.503.727.2265 – Portland  
D. +1.303.291.2315 – Denver  
M. +1.303.514.1896  
F. +1.503.346.2265  
E. [JHunter@perkinscoie.com](mailto:JHunter@perkinscoie.com)

**2023 Law Firm of the Year | Environmental Law** *Chambers USA*

**2023, 2021, 2019 and 2017 Law Firm of the Year | Natural Resources Law** *U.S. News – Best Lawyers® “Best Law Firms”*

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**From:** [Laura Tabor](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Cc:** [Lauren Link](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Friday, October 13, 2023 1:42:25 PM  
**Attachments:** [TNC DEQ Climate2023 Proposed Rules Comments 20231013.pdf](#)

---

You don't often get email from [laura.tabor@tnc.org](mailto:laura.tabor@tnc.org). [Learn why this is important](#)

Hello,

Please find attached comments on behalf of The Nature Conservancy for this rulemaking. We appreciate the extended deadline. Please let us know if you have any questions!

Best,

Laura

**Laura Tabor**

Climate Action Director | *she/her*

The Nature Conservancy in Oregon

999 SW Disk Drive, Suite 104 | Bend, OR 97702

[laura.tabor@tnc.org](mailto:laura.tabor@tnc.org) | 541.241.1734

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Friday, October 13, 2023 2:05:56 PM

---

Dear Nicole Singh,

The Strategic Economic Development Corporation (SEDCOR) recognizes the challenges that we face as we collectively work to address climate change and its impacts. As one of our utility partners in our economic development work, NW Natural is a leader in working toward decarbonization, exemplified by its renewable natural gas initiative. But we are concerned about the cost and effectiveness of the Climate Action Program as currently proposed and urge you not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) .

Limiting opportunities for development will decrease supply and ultimately increase costs. Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing the state from meeting our clean electricity goals. Additionally, arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Oregon's processors and manufacturers compete on an international scale; these types of policies ultimately would raise production costs, and the region would quickly become less competitive for future investment.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
Erik Andersson  
626 High Street NE, Suite 200  
Salem, OR 97301  
[eandersson@sedcor.com](mailto:eandersson@sedcor.com)

**From:** [Mary Staub](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** DEQ 2023 Climate Rulemaking Comment  
**Date:** Friday, October 13, 2023 2:15:16 PM

---

You don't often get email from mary.staub@edstaub.com. [Learn why this is important](#)

Dear DEQ Team,

I want to share my concerns and thoughts about the proposed changes to the Climate 2023 Rulemaking by DEQ. These changes involve Bio-Methane regulation, Book and Claim accounting, commercial Hydrogen, and the "Lookback" for Covered Entities.

First, it's essential to understand that petroleum-based energy, despite criticism, plays a vital role in Oregon's economy. It not only provides energy but also contributes to economic development and job creation. We should consider the benefits and potential costs of all energy choices, especially in terms of economic impact and human well-being.

During a recent DEQ climate Rulemaking Public Hearing on September 18th, it became clear that some groups have reservations about allowing covered entities in Oregon to use book and claim accounting for Bio-Methane from other states. However, these groups seem to support the use of electric vehicles made outside Oregon and the importation of out-of-state electricity, even without direct economic benefits to our citizens. This creates a difference in standards between Bio-Methane and out-of-state electricity.

We urge DEQ to maintain the current regulations for Bio-Methane without further changes. Book and claim accounting has worked well for using out-of-state Bio-Methane in Oregon's electricity generation.

Changing these rules could lead to higher electricity costs, impacting consumers, including those in environmental justice communities. To minimize costs and achieve equity, DEQ should refrain from altering existing regulations. Technological advancements can help with CO2 levels, but economic distress from hasty rule changes cannot be easily reversed.

We believe Bio-Methane should not be subject to geographical constraints for book and claim reporting. There should be no requirements to inject Bio-Methane into an Oregon natural gas pipeline, no restrictions on vintage use for greenhouse gas reporting, and no time constraints. Bio-Methane should be allowed to be claimed and delivered to end-users in Oregon, even if it displaces natural gas used in a connected pipeline.

The book and claim regulations established by DEQ at the start of the Greenhouse Gas Reporting program should remain unchanged. They strike a balance between environmental concerns and our state's energy infrastructure needs.

Hydrogen, especially "Gray" and "Blue" Hydrogen, is a lower emissions alternative worth considering.

Electric vehicles, while promoted as environmentally friendly, are not entirely carbon neutral, and their production outside Oregon doesn't benefit our state's economy. We must consider the entire lifecycle and make informed decisions.

Altering book and claim rules could lead to an energy crisis in Oregon, impacting citizens and energy stability. We believe a one-year lookback period should be incorporated into the regulations to benefit all covered entities.

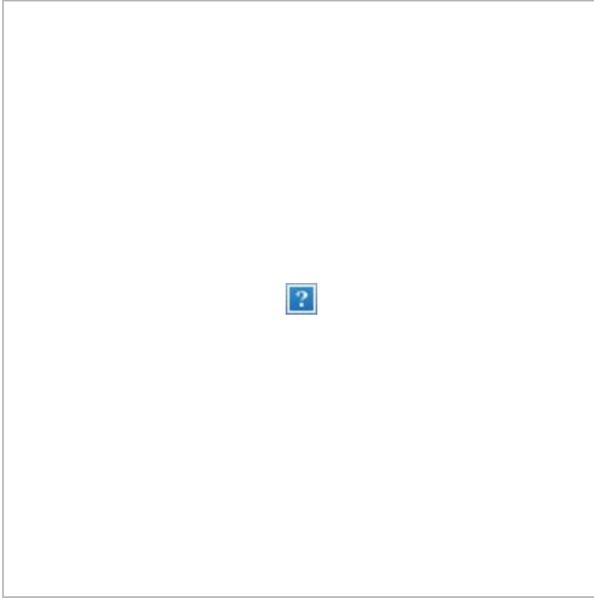
Thank you for your commitment to responsible governance and reliable energy stewardship.  
Sincerely,

**Mary Staub**  
**Ed Staub & Sons**

(541)417-2322

[mary.staub@edstaub.com](mailto:mary.staub@edstaub.com)

[www.edstaub.com](http://www.edstaub.com)



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**From:** [Christine Taylor](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Proposed Changes to the Climate 2023 Rulemaking  
**Date:** Friday, October 13, 2023 2:18:33 PM

---

You don't often get email from christine\_t\_25@hotmail.com. [Learn why this is important](#)

Dear DEQ Team,

I want to share my concerns and thoughts about the proposed changes to the Climate 2023 Rulemaking by DEQ. These changes involve Bio-Methane regulation, Book and Claim accounting, commercial Hydrogen, and the "Lookback" for Covered Entities.

First, it's essential to understand that petroleum-based energy, despite criticism, plays a vital role in Oregon's economy. It not only provides energy but also contributes to economic development and job creation. We should consider the benefits and potential costs of all energy choices, especially in terms of economic impact and human well-being.

During a recent DEQ climate Rulemaking Public Hearing on September 18th, it became clear that some groups have reservations about allowing covered entities in Oregon to use book and claim accounting for Bio-Methane from other states. However, these groups seem to support the use of electric vehicles made outside Oregon and the importation of out-of-state electricity, even without direct economic benefits to our citizens. This creates a difference in standards between Bio-Methane and out-of-state electricity.

We urge DEQ to maintain the current regulations for Bio-Methane without further changes. Book and claim accounting has worked well for using out-of-state Bio-Methane in Oregon's electricity generation. Changing these rules could lead to higher electricity costs, impacting consumers, including those in environmental justice communities. To minimize costs and achieve equity, DEQ should refrain from altering existing regulations. Technological advancements can help with CO2 levels, but economic distress from hasty rule changes cannot be easily reversed.

We believe Bio-Methane should not be subject to geographical constraints for book and claim reporting. There should be no requirements to inject Bio-Methane into an Oregon natural gas pipeline, no restrictions on vintage use for greenhouse gas reporting, and no time constraints. Bio-Methane should be allowed to be claimed and delivered to end-users in Oregon, even if it displaces natural gas used in a connected pipeline.

The book and claim regulations established by DEQ at the start of the Greenhouse Gas Reporting program should remain unchanged. They strike a balance between environmental concerns and our state's energy infrastructure needs.

Hydrogen, especially "Gray" and "Blue" Hydrogen, is a lower emissions alternative worth considering. Electric vehicles, while promoted as environmentally friendly, are not entirely carbon neutral, and their production outside Oregon doesn't benefit our state's economy. We must consider the entire lifecycle and make informed decisions.

Altering book and claim rules could lead to an energy crisis in Oregon, impacting citizens and energy stability. We believe a one-year lookback period should be incorporated into the regulations to benefit all covered entities.

Thank you for your commitment to responsible governance and reliable energy stewardship.

Sincerely,

Christine Taylor Bugenig

Sent from [Outlook](#)

**From:** [Reigelsperger, Christopher](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** WM comments on Oregon book-and-claim  
**Date:** Friday, October 13, 2023 2:23:08 PM  
**Attachments:** [WM Comments on Oregon book-and-claim.docx](#)

---

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Please see attached. Happy Friday!

**Chris Reigelsperger**  
**Manager - Government Affairs, Public Sector Solutions**  
Pacific Northwest/British Columbia  
[creigels@wm.com](mailto:creigels@wm.com)  
T: 425-681-0398



**From:** [Michelle Detwiler](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Cc:** [Martina Steinkusz](#)  
**Subject:** RHA Comments on Climate 2023 GHG Emission Reporting Proposed Rules  
**Date:** Friday, October 13, 2023 2:38:49 PM  
**Attachments:** [2023-13-10 RHA 2023 DEQ CPP GHG Rep"t Comments.pdf](#)

---

Dear Nicole and Elizabeth,

Please find attached RHA's comments on the Climate 2023 GHG Reporting Program proposed rules.

Thank you,  
Michelle



**Michelle Detwiler | Executive Director**

**a:** Renewable Hydrogen Alliance

**e:** [m.detwiler@renewableh2.org](mailto:m.detwiler@renewableh2.org) | **w:** [renewableh2.org/](https://renewableh2.org/)

**p:** 971-727-9423 | [Sign Up for RHA Newsletter](#)

**From:** [Civiclick](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment: Please Keep Costs Down  
**Date:** Friday, October 13, 2023 2:46:13 PM

---

Dear Nicole Singh,

As an Oregonian, I'm very concerned about the costs and effectiveness of the Climate Protection Program. I urge DEQ not to further increase costs by imposing geographic limitations on renewable natural gas (RNG) because more opportunities for development will increase supply and drive costs down.

- Arbitrary geographic boundaries simply don't make sense and will increase costs for all Oregonians.
- Arbitrary geographic boundaries for RNG would be akin to excluding wind and solar resources from outside of Oregon, preventing us from meeting our clean electricity goals.
- Arbitrary geographic boundaries do not cut more carbon, and in fact, will limit carbon reduction opportunities.

Please confirm that DEQ will not include geographic limits for decarbonized fuels like renewable natural gas and will allow the use of book and claim accounting methodology under the Greenhouse Gas Reporting Rule.

Please keep costs down and focus this program on quantifiable solutions to address climate change.

Sincerely,  
John Carlson  
7105 SW 175th Ave  
Aloha, OR 97007  
[jrc.tiger@frontier.com](mailto:jrc.tiger@frontier.com)

**From:** [Dan McGraw](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Cc:** [SINGH Nicole \\* DEQ](#)  
**Subject:** Book-and-Claim comments  
**Date:** Friday, October 13, 2023 3:00:10 PM  
**Attachments:** [Mercuria OR DEQ support letter.pdf](#)

---

Hey!

Please see the attached comments on the proposed book-and-claim language for Oregon's CFS program.

Thanks,

Dan McGraw  
Head of Regulatory Analysis  
Mercuria Energy  
Cell: 281-757-3774  
Email: [Dmcgraw@mercuria.com](mailto:Dmcgraw@mercuria.com)

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**From:** [Krebsbach, Abbie](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Cc:** [Madison, Scott](#); [Forrester, Gabe](#); [Koelzer, Megan](#); [Nieraeth, Shawna](#); [Fong, Cory](#); [Spector, Alyn](#); [Marek, Chanda](#); [Blattner, Lori](#)  
**Subject:** Cascade Natural Gas Comments on 2023 DEQ GHG Reporting Rule and CPP Rule Amendments  
**Date:** Friday, October 13, 2023 3:14:25 PM  
**Attachments:** [CNGC ORDEQ GHG Rule Comment Letter 20231013.pdf](#)

---

You don't often get email from [abbie.krebsbach@mdu.com](mailto:abbie.krebsbach@mdu.com). [Learn why this is important](#)

Good afternoon Nicole and Elizabeth,

Please see Cascade Natural Gas Corporation's comment letter attached.

Have a good weekend.

*Abbie S. Krebsbach*

Environmental Director  
Cascade Natural Gas Corporation | Intermountain Gas Company  
Montana-Dakota Utilities Co. | Great Plains Natural Gas Co.  
400 N. 4th Street  
Bismarck, ND 58501  
Phone: 701-222-7844  
[abbie.krebsbach@mdu.com](mailto:abbie.krebsbach@mdu.com)

**From:** [Dan Kirschner](#)  
**To:** [Natasha Jackson](#)  
**Cc:** [2023 Climate \\* DEQ](#)  
**Subject:** Re: 2023 Climate Rulemaking Comments  
**Date:** Friday, October 13, 2023 3:21:30 PM

---

You don't often get email from dkirschner@nwga.org. [Learn why this is important](#)

Solid work on this letter and the broader effort in general, Natasha.

Dan Kirschner, Executive Director  
Northwest Gas Association  
1914 Willamette Fall Dr #260  
West Linn, OR 97068  
O - (503) 344-6637  
M - (503) 880-7269  
[www.nwga.org](http://www.nwga.org)

On Oct 13, 2023, at 3:13 PM, Natasha Jackson <njackson@nwga.org> wrote:

To whom it may concern-

Please accept the attached comments on the 2023 Climate Protection Program Rulemaking from concerned workers and business leaders across Oregon.

Thank you,

[<image001.png>](#)

[<image002.png>](#)

[<image003.png>](#)

[<image004.png>](#)

[<image005.png>](#)

**Natasha Jackson**

Policy and Partnerships Manager

**Office:** 503-344-6637

**Mobile:** 208-446-8616

1914 Willamette Falls Drive, Suite 260  
West Linn, OR 97068

*Advocating for the role of the region's natural gas infrastructure in safely delivering a clean, dependable and affordable energy future.*

<2023 CPP Rulemaking Oct 13 2023 Omnibus Letter.pdf>

**From:** [Cherice Bock](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Friday, October 13, 2023 3:28:37 PM  
**Attachments:** [350PDX comment to DEQ re CPP.pdf](#)

---

You don't often get email from cherice@350pdx.org. [Learn why this is important](#)

**Greetings,**

**Please see our comment, attached. Thank you!**

**Cherice Bock (she/her)  
Policy Manager  
[350PDX](#)**



**\*\*\* 350PDX is 10 years old! Join us at our 10 Year Anniversary Party on  
Thursday, November 2!  
[More info and tickets here.](#) \*\*\***

**From:** [Ashley Haight](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Friday, October 13, 2023 3:29:35 PM  
**Attachments:** [ZERO Coalition Comments - DEQ 2023 Climate Rulemaking.pdf](#)

---

You don't often get email from ashley@zerocoalitionoregon.org. [Learn why this is important](#)

Hello,

Please see the attached comments from the ZERO Coalition on DEQ's 2023 Climate Rulemaking. We appreciate the opportunity to provide comments.

Best regards,  
Ashley Haight

--

photo



**Ashley Haight**  
ZERO Coalition Manager  
Pronouns she/her

---

**O** 503.968.7160 x132    **M** 541.510.9620

**E** [ashley@zerocoalitionoregon.org](mailto:ashley@zerocoalitionoregon.org)    **W** [zerocoalitionoregon.org](http://zerocoalitionoregon.org)



**From:** [Margaret Butler](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Comments of rules for CPP  
**Date:** Friday, October 13, 2023 3:29:42 PM

---

You don't often get email from [margaretjwj@gmail.com](mailto:margaretjwj@gmail.com). [Learn why this is important](#)

My comments: Given the short timeframe global scientists say we have to reduce emissions, it is imperative for the life of all living beings, that these rulings be as strong as possible in line with the goals of the state Climate Protection Plan, instead of fostering business-as-usual or false solutions. I'm disappointed then, to see that the DEQ is not seizing this opportunity-- and accepting your moral responsibility-- to take the strongest possible action. Our lives depend on what we do in the next handful of years.

Here are my specific requests and recommendations:

1. Restricting biomethane and hydrogen used for CPP compliance to that which produces direct benefits for Oregonians, by limiting the eligible use of "book and claim" accounting to only biomethane or hydrogen that is injected into a pipeline within Oregon. Biomass derived fuels should not be allowed exemptions.
2. Strengthening emissions reduction requirements for new or expanded large stationary source facilities in Oregon. Unfortunately, since the adoption of the final CPP rules in 2021, increasing emissions from Oregon's industrial sector have become a reality. We should be holding polluters responsible for decreasing emissions.
3. Maintaining protective restrictions on methane and biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from anthropogenic carbon sources does not comply with the CPP.
4. Including export and transport facilities in emission reduction and reporting standards. Export facilities should have to list their final destinations. While they may utilize devices to reduce emissions during pumping phases, the open venting of railroad cars to reduce sparking must also be taken under consideration as should potential leakage during storage, transportation, and transfers. Any substantive change of site use should require a new Air Contaminant Discharge Permit (ACDP) or Title V permitting instead of being allowed to operate under old permits. Export facilities add to overall global emissions which affect us all in terms of climate chaos.
5. Biofuels and other so-called renewable fuels should not only be reporting on feedstocks and production methodologies, but also on the fuels used for hydrogenation, esterification or other processing to adequately access the true Carbon Intensity numbers. Reporting should also include the land change values necessary to determine what other crops the land could have produced for human consumption as well as associated transportation and fertilizer emissions, and the like for a full picture. Carbon intensity modeling is problematic in numerous ways which is why actual monitoring data and health assessments are preferable.

Thank you for considering these changes, and for doing the right thing by future generations. This is really important. I appreciate your service and the opportunity to comment.

**From:** [Robert Camarillo](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Cc:** [Hayley Watson](#); [Angi Dilkes](#)  
**Subject:** OSBCTC Climate Rulemaking.pdf  
**Date:** Friday, October 13, 2023 3:38:00 PM  
**Attachments:** [OSBCTC Climate Rulemaking.pdf](#)

---

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Dear Ms. Singh, please see attached letter regarding climate 2023 rulemaking.

Thank you,

Robert Camarillo  
Executive Secretary

Oregon State BCTC

1001 Molalla Ave. Ste 207

503. 788.7153

C. 503.847.6377

Robert@oregonbuildingtrades.com

[www.oregonbuildingtrades.com](http://www.oregonbuildingtrades.com)

**From:** [Prabhdip](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** DEQ  
**Date:** Friday, October 13, 2023 3:39:46 PM

---

You don't often get email from prabhdip0606@yahoo.com. [Learn why this is important](#)

Dear DEQ Team,

I want to share my concerns and thoughts about the proposed changes to the Climate 2023 Rulemaking by DEQ. These changes involve Bio-Methane regulation, Book and Claim accounting, commercial Hydrogen, and the "Lookback" for Covered Entities.

First, it's essential to understand that petroleum-based energy, despite criticism, plays a vital role in Oregon's economy. It not only provides energy but also contributes to economic development and job creation. We should consider the benefits and potential costs of all energy choices, especially in terms of economic impact and human well-being.

During a recent DEQ climate Rulemaking Public Hearing on September 18th, it became clear that some groups have reservations about allowing covered entities in Oregon to use book and claim accounting for Bio-Methane from other states. However, these groups seem to support the use of electric vehicles made outside Oregon and the importation of out-of-state electricity, even without direct economic benefits to our citizens. This creates a difference in standards between Bio-Methane and out-of-state electricity.

We urge DEQ to maintain the current regulations for Bio-Methane without further changes. Book and claim accounting has worked well for using out-of-state Bio-Methane in Oregon's electricity generation. Changing these rules could lead to higher electricity costs, impacting consumers, including those in environmental justice communities. To minimize costs and achieve equity, DEQ should refrain from altering existing regulations. Technological advancements can help with CO2 levels, but economic distress from hasty rule changes cannot be easily reversed.

We believe Bio-Methane should not be subject to geographical constraints for book and claim reporting. There should be no requirements to inject Bio-Methane into an Oregon natural gas pipeline, no restrictions on vintage use for greenhouse gas reporting, and no time constraints. Bio-Methane should be allowed to be claimed and delivered to end-users in Oregon, even if it displaces natural gas used in a connected pipeline.

The book and claim regulations established by DEQ at the start of the Greenhouse Gas Reporting program should remain unchanged. They strike a balance between environmental concerns and our state's energy infrastructure needs.

Hydrogen, especially "Gray" and "Blue" Hydrogen, is a lower emissions alternative worth considering. Electric vehicles, while promoted as environmentally friendly, are not

entirely carbon neutral, and their production outside Oregon doesn't benefit our state's economy. We must consider the entire lifecycle and make informed decisions.

Altering book and claim rules could lead to an energy crisis in Oregon, impacting citizens and energy stability. We believe a one-year lookback period should be incorporated into the regulations to benefit all covered entities.

Thank you for your commitment to responsible governance and reliable energy stewardship.

Sincerely,  
Prabhdip Singh

Sent from my iPhone

**From:** [Sharla Moffett](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Cc:** [SINGH Nicole \\* DEQ](#); [ELBEL Elizabeth \\* DEQ](#)  
**Subject:** OBI Comments on the Proposed Rule  
**Date:** Friday, October 13, 2023 3:43:47 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[OBI Comments on CPP \(Climate 2023\) Rulemaking.pdf](#)

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Some people who received this message don't often get email from [sharlamoffett@oregonbusinessindustry.com](mailto:sharlamoffett@oregonbusinessindustry.com).  
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Good afternoon DEQ Rule Managers:

Please find attached OBI's comments on the CPP (Climate 2023) rulemaking.

Thank you for considering our comments and please reach out if you have questions.

Have a great weekend.

Sharla

**Sharla Moffett** | Senior Policy Director  
**Oregon Business & Industry**

**M:** 971.998.2272 **E:** [sharlamoffett@oregonbusinessindustry.com](mailto:sharlamoffett@oregonbusinessindustry.com)

200 SW Market Street L100 | Portland, OR 97201 | [www.oregonbusinessindustry.com](http://www.oregonbusinessindustry.com)



**From:** [Arlene Sherrett](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Re: Comments on Climate 2023 Proposed rules  
**Date:** Friday, October 13, 2023 3:45:57 PM  
**Attachments:** [Comments on Climate 2023 rulemaking.docx](#)

---

You don't often get email from arlenesherrett3019@gmail.com. [Learn why this is important](#)

On Fri, Oct 13, 2023 at 3:42 PM Arlene Sherrett <[arlenesherrett3019@gmail.com](mailto:arlenesherrett3019@gmail.com)> wrote:  
Please see attached.

**From:** [Greer Ryan](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Re: 2023 Climate Rulemaking -- Joint comments on proposed rules  
**Date:** Friday, October 13, 2023 3:50:58 PM  
**Attachments:** [Final Joint Comments, 2023 Climate Rulemaking.pdf](#)

---

You don't often get email from greer.ryan@climatesolutions.org. [Learn why this is important](#)

To DEQ staff,

Thank you for the opportunity to provide feedback on the proposed rules in the 2023 Climate Rulemaking. Attached, please find joint comments submitted on behalf of 36 organizations representing climate, public health, business, faith, and environmental justice communities from across Oregon. Please let us know if you have any questions.

Thanks,  
Greer

**Greer Ryan** | Clean Buildings Policy Manager  
[Climate Solutions](#) – Accelerating Clean Energy Solutions to the Climate Crisis  
[greer.ryan@climatesolutions.org](mailto:greer.ryan@climatesolutions.org)

**From:** [Mark](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment  
**Date:** Friday, October 13, 2023 3:58:50 PM

---

You don't often get email from markrtipper@gmail.com. [Learn why this is important](#)

**To Whom It May Concern:**

Compared to other climate programs, DEQ's price per ton of CO2 is the most expensive in North America. And costs will increase over time as requirements to reduce emissions become more stringent. I believe DEQ should leverage the lowest-cost and most available resources for Oregonians as we decarbonize the gas system over time and not include geographic limits for renewable natural gas projects.

Carbon policy should be clearly authorized by laws and regulations; and those laws, regulations and resulting programs should be effective and as affordable as possible; they should result in verifiable reductions in greenhouse gas emissions; and the impact on consumers should be clearly understood.

DEQ did not analyze the costs, alternative solutions, and economic impacts of their final program design, so no one knows the true cost to Oregonians - at the pump, at the grocery store, in other goods and services, or in their energy bills.

I stand with NW Natural in my belief that the DEQ is working outside its authority in moving forward with this program, that the new program lacks accountability, will be costly for customers and is unlikely to result in all the emission reductions customers will be paying for.

Notable concerns include:

1. DEQ rejected the use of verified offsets as a compliance option, a proven strategy to lower emissions affordably.
2. A significant portion of DEQ's program is based on untested paper credits, referred to as Community Climate Investments, which do not ensure climate benefits attributed to the program actually occur.

These elements are inconsistent with all other carbon regulation in North America and should be fixed.

-Mark

**From:** [Robert Short](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** letter re Climate Action Plan  
**Date:** Friday, October 13, 2023 3:58:54 PM  
**Attachments:** [DEQ letter 3.docx](#)

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Please consider the attached letter as testimony on the Climate Action Plan.

**From:** [prabhdip.parmar](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** DEQ  
**Date:** Friday, October 13, 2023 3:59:16 PM  
**Attachments:** [DEQ Climate 2023 Rulemaking Comment.docx](#)

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Lavdeep Singh

**From:** [Ryan Kenny](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Rulemaking Comment  
**Date:** Friday, October 13, 2023 4:00:40 PM  
**Attachments:** [CLNE Draft Comments on Oregon Draft LCFS FINAL.pdf](#)

---

You don't often get email from ryan.kenny@cleanenergyfuels.com. [Learn why this is important](#)

Hello,

Please find attached a comment letter from Clean Energy on the Climate 2023 Rulemaking: Appendix of Proposed Rules.

Thank you,

**Ryan Kenny**

Senior Public Policy & Regulatory Affairs Advisor – Western U.S.



Mobile: 949-536-1962

[ryan.kenny@cleanenergyfuels.com](mailto:ryan.kenny@cleanenergyfuels.com)

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**From:** [Sielicky, Zachary](#)  
**To:** [Andersson E; 2023 Climate \\* DEQ](#)  
**Subject:** Re: [External]Comments re: Climate Action Plan Rulemaking  
**Date:** Friday, October 13, 2023 4:19:08 PM  
**Attachments:** [image001.png](#)

---

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**From:** Erik Andersson <EAndersson@sedcor.com>  
**Sent:** Friday, October 13, 2023 3:56:47 PM  
**To:** Climate.2023@deq.oregon.gov <Climate.2023@deq.oregon.gov>  
**Subject:** [External]Comments re: Climate Action Plan Rulemaking

**CAUTION: This email originated outside NW Natural. Please DO NOT CLICK LINKS OR OPEN ATTACHMENTS unless you recognize the sender and know the content is safe.**

Please see attached.

Thank you.

**Erik Andersson** / President / SEDCOR / 626 High Street NE, #200 / Salem, OR 97301  
503.837.1800 / [eandersson@sedcor.com](mailto:eandersson@sedcor.com)  
[www.sedcor.com](http://www.sedcor.com)



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**From:** [Daniel Hanthorn](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** DEQ Climate Protection Program Rules Comments  
**Date:** Friday, October 13, 2023 4:19:40 PM

---

You don't often get email from dan\_hanthorn@hotmail.com. [Learn why this is important](#)

With a 47-year career as an environmental professional, specializing in water and residual solids treatment, I have the education, knowledge and experience to provide comments regarding Climate Protection Rulemaking. The eventual outcomes of DEQs efforts will have broad and impactful implications as they should. Sensible, rational new Rules are paramount to climate protection.

For your consideration, I submit:

Potentially useful methane is produced in municipal and private facilities as a byproduct of wastewater treatment. However, the resulting biogas containing methane is heavily contaminated and of limited value. Biogas cleanup to pipeline quality gas is typically not cost effective onsite at producers' facilities. As a result, most biogas is flared or burned to the atmosphere without treatment releasing other, coproduced contaminants.

I support NWNatural's efforts to recycle and provide pipeline quality treatment of biogas. Recycling biogas will improve the climate by both: 1) the reduction of atmospheric contamination due to flaring of untreated biogas; and 2) providing a replacement for traditional (and additional) natural gas supplies.

To do so quickly and soon the new rules must keep costs down, and incentivize and subsidize, this important climatological and social transition.

Respectfully submitted,

Daniel R Hanthorn  
541-602-5463

**From:** [Frances Dunham](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Friday, October 13, 2023 5:09:26 PM

---

You don't often get email from francesdunham@97520.net. [Learn why this is important](#)

Dear 2023 DEQ Climate Rulemaking,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane (aka renewable natural gas (RNG)) used for CPP compliance to that which produces direct benefits for Oregonians – projects that reduce pollution in Oregon.
- 2) Disallowing hydrogen to be used for CPP compliance unless it is green electrolytic hydrogen (made from renewable energy sources like solar and wind). Why? Not all hydrogen is created equally. Where and how it is produced and used matters significantly when it comes to emissions reduction – if it's produced from fossil fuels out-of-state, it could be more polluting than even natural gas.
- 3) Strengthening emissions reduction requirements for new or expanded large industrial facilities in Oregon under the CPP's Best Available Emissions Reduction (BAER) program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they

benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,  
Frances Dunham  
807 Beach Street  
Ashland, OR 97520

**From:** [Pat Kaczmarek](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Friday, October 13, 2023 5:09:27 PM

---

You don't often get email from patk5@msn.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

To: Oregon Department of Environmental Quality,

In Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, and provide direct economic and environmental benefits to communities on the front lines of climate change. I am a long time resident of this state, and I strongly support meaningful, bold steps to mitigate the effects of climate change. The Climate Protection Program is critically important and has strong community input.

However, the recent rule-making table did not include community input, and the results lacked a clear statement of the plan's original goals of reducing greenhouse gas emissions by 50%, providing meaningful investments to benefit Oregonians and holding big polluters accountable.

Therefore, I am calling on the DEQ to adapt the rules for CPP implementation to focus on the original goals of:

- 1) Reducing greenhouse gas emissions and other air pollutants, maximizing public health benefits, and minimizing costs for communities in Oregon.
- 2) Keeping economic and health benefits of the Community Climate Investment program in Oregon: investments should materially benefit Oregonians at the frontlines of pollution and the climate crisis.
- 3) Achieving real reduction of emissions by 50%, rather than allowing companies to invest in biomass-derived fuels that produce methane and use production methods that emit fossil fuels.
- 4) Holding big polluters accountable to engage in science-based "best available emissions reductions" (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.
- 5) Returning the date for a "new source" of stationary pollution to December 31, 2021.

The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Now is the time for major action on Climate Change. We need clearly stated goals, plans and timelines. The future of our planet is at stake.

Sincerely,

Pat Kaczmarek  
4709 SW 31st Dr  
Portland, OR 97239

**From:** [Sandra Joos](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Friday, October 13, 2023 5:09:28 PM

---

You don't often get email from joosgalefamily@comcast.net. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

However, I was disappointed to hear that the recent rule-making table did not include community input, and also that the results lacked in meeting the plan's original goals of reducing greenhouse gas emissions by 50%, providing meaningful investments to benefit Oregonians, and holding big polluters accountable.

Therefore, I am calling on the DEQ to adapt the rules for CPP implementation to focus on the original goals of:

- 1) Reducing greenhouse gas emissions and other air pollutants, maximizing public health benefits, and minimizing costs for consumers in environmental justice and other communities in Oregon.
- 2) Keeping economic and health benefits of the Community Climate Investment program in Oregon: investments should materially benefit Oregonians at the frontlines of pollution and the climate crisis, rather than paying for cheap offsets in other places.
- 3) Achieving real reduction of emissions by 50%, rather than allowing companies to invest in biomass-derived fuels such as "renewable natural gas" (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
- 4) Holding big polluters accountable to engage in science-based "best available emissions reductions" (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.
- 5) Returning the date for a "new source" of stationary pollution to December 31, 2021.

The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
Sandra Joos  
4259 SW Patrick Pl  
Portland, OR 97239

**From:** [Janie Thomas](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Friday, October 13, 2023 5:09:28 PM

---

You don't often get email from mjthomas@duck.com. [Learn why this is important](#)

Dear 2023 DEQ Climate Rulemaking,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane (aka renewable natural gas (RNG)) used for CPP compliance to that which produces direct benefits for Oregonians – projects that reduce pollution in Oregon.
- 2) Disallowing hydrogen to be used for CPP compliance unless it is green electrolytic hydrogen (made from renewable energy sources like solar and wind). Why? Not all hydrogen is created equally. Where and how it is produced and used matters significantly when it comes to emissions reduction – if it's produced from fossil fuels out-of-state, it could be more polluting than even natural gas.
- 3) Strengthening emissions reduction requirements for new or expanded large industrial facilities in Oregon under the CPP's Best Available Emissions Reduction (BAER) program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they

benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

OR

Sincerely,  
Janie Thomas  
29437 Gimpl Hill Rd  
Eugene, OR 97402

**From:** [Wendy McGowan](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** 2023 Climate Rulemaking  
**Date:** Friday, October 13, 2023 5:09:29 PM

---

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Dear 2023 DEQ Climate Rulemaking,

To whom it may concern,

As DEQ knows well, this rulemaking will have far-reaching consequences for the climate and communities in Oregon. By designing guardrails and pathways for regulated entities to comply with Oregon's cornerstone Climate Protection Program (CPP), this rulemaking – if done well – will be vital to ensuring our state stays on track to achieve our climate goals, and to deliver public health, economic, and employment benefits for environmental justice communities in Oregon.

However, given the broad scope of issues and laws touched by this proceeding, there could be very serious unintended consequences if impacts to communities and the climate are not sufficiently considered. I am concerned that DEQ's current proposed rules would allow regulated gas utilities to rely on out-of-state biomethane investments, and would enable the expansion of new large industrial emitters with the potential to emit unfettered climate pollution in Oregon. The stated goals of the CPP are to reduce greenhouse gas (GHG) emissions and other air pollutants, maximize public health benefits, and minimize costs for consumers in environmental justice and other communities in Oregon, yet these RNG projects deliver no direct benefits to Oregonians. Further, allowing covered fuel suppliers to rely on out-of-state biomethane presents the alarming likelihood that investments will be diverted from the Community Climate Investment (CCI) program, which was designed to provide economic, health and comfort benefits to the communities most in need as well as significant emissions reductions.

I therefore strongly urge DEQ to amend the proposed rules by:

- 1) Restricting biomethane (aka renewable natural gas (RNG)) used for CPP compliance to that which produces direct benefits for Oregonians – projects that reduce pollution in Oregon.
- 2) Disallowing hydrogen to be used for CPP compliance unless it is green electrolytic hydrogen (made from renewable energy sources like solar and wind). Why? Not all hydrogen is created equally. Where and how it is produced and used matters significantly when it comes to emissions reduction – if it's produced from fossil fuels out-of-state, it could be more polluting than even natural gas.
- 3) Strengthening emissions reduction requirements for new or expanded large industrial facilities in Oregon under the CPP's Best Available Emissions Reduction (BAER) program.

I also strongly support maintaining protective restrictions on biomethane accounting in the current rules where they exist, including notably, that synthetic methane derived from human-caused carbon sources does not comply with the CPP. Doing so will not only help ensure that Oregon stays on track to achieve our climate goals, but will also maximize the associated job creation, cost saving, public health, and economic development benefits– ensuring that they

benefit Oregon communities, and are not exported out of state.

Thank you for the opportunity to provide comments.

Sincerely,  
Wendy McGowan  
3189 Admiral Street  
Eugene, OR 97404

**From:** [Phil Houston Goldsmith](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** Prioritize justice in Climate Protection Program implementation  
**Date:** Friday, October 13, 2023 5:09:32 PM

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You don't often get email from phil@lopqlaw.com. [Learn why this is important](#)

Dear Oregon Department of Environmental Quality,

Dear Oregon Department of Environmental Quality,

I was thrilled when, in Dec 2021, the DEQ passed the Climate Protection Program (CPP) to require 50% emissions reductions in Oregon's largest polluting facilities by 2035, provide direct economic and environmental benefits to communities on the frontlines of climate change and environmental injustices, and more. As an Oregonian who strongly believes in my state taking meaningful, bold steps to mitigate the effects of climate change and provide direct support to frontline communities, I see the CPP as laying out a critically important path, especially since the CPP originally integrated strong community input.

However, I was disappointed to hear that the recent rule-making table did not include community input, and also that the results lacked in meeting the plan's original goals of reducing greenhouse gas emissions by 50%, providing meaningful investments to benefit Oregonians, and holding big polluters accountable.

Therefore, I am calling on the DEQ to adapt the rules for CPP implementation to focus on the original goals of:

- 1) Reducing greenhouse gas emissions and other air pollutants, maximizing public health benefits, and minimizing costs for consumers in environmental justice and other communities in Oregon.
- 2) Keeping economic and health benefits of the Community Climate Investment program in Oregon: investments should materially benefit Oregonians at the frontlines of pollution and the climate crisis, rather than paying for cheap offsets in other places.
- 3) Achieving real reduction of emissions by 50%, rather than allowing companies to invest in biomass-derived fuels such as "renewable natural gas" (which is still composed mainly of methane, a greenhouse gas 86 times more potent than carbon dioxide), or hydrogen that is produced in ways that emit fossil fuels.
- 4) Holding big polluters accountable to engage in science-based "best available emissions reductions" (BAER) from existing stationary sources and deterring development of new stationary sources in Oregon, with accountability including stakeholder and frontline community input.
- 5) Returning the date for a "new source" of stationary pollution to December 31, 2021.

The CPP should facilitate the actual 50% reduction in emissions of all stationary polluting facilities, and Community Climate Investments should benefit those who have already experienced harm from pollutants and who are at most risk from climate impacts.

Thank you for considering these comments and recommendations.

Sincerely,  
Phil Houston Goldsmith  
3110 NW 112th Pl  
Portland, OR 97229

**From:** [CPP INFO \\* DEQ](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** FW: Dept of Environmental Quality Climate 2023 Rulemaking  
**Date:** Friday, October 13, 2023 5:40:32 PM

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**From:** Diana Boom <dianaboom@comcast.net>  
**Sent:** Thursday, October 12, 2023 4:08 PM  
**To:** CPP INFO \* DEQ <cpp.info@deq.oregon.gov>  
**Subject:** Dept of Environmental Quality Climate 2023 Rulemaking

You don't often get email from [dianaboom@comcast.net](mailto:dianaboom@comcast.net). [Learn why this is important](#)

I agree with the position of the League of Women Voters Oregon Climate Emergency Team that changes are needed to close loopholes and guarantee robust emissions reductions.

Therefore the Climate 2023 rulemaking changes should:

- Ensure direct benefits for Oregon communities by only allowing biomethane (aka Renewable Natural Gas) compliance credits for production within Oregon, not from out-of-state.
- Restrict hydrogen for CPP compliance unless DEQ ensures it is green electrolytic hydrogen. Other hydrogen sources and types are far more polluting, with more risks for our energy system.
- Strengthen emissions reduction requirements for industries.

Diana Boom  
PO Box 328  
Lake Oswego OR 97034

**From:** [CPP INFO \\* DEQ](#)  
**To:** [2023 Climate \\* DEQ](#)  
**Subject:** FW: Climate 2023 Rulemaking  
**Date:** Friday, October 13, 2023 5:40:44 PM

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**From:** Marjorie Stevens <[greenstevens@gmail.com](mailto:greenstevens@gmail.com)>  
**Sent:** Friday, October 13, 2023 3:08 PM  
**To:** CPP INFO \* DEQ <[cpp.info@deq.oregon.gov](mailto:cpp.info@deq.oregon.gov)>  
**Cc:** Keith, Claudia <[ca.keith@comcast.net](mailto:ca.keith@comcast.net)>; Marjorie Stevens <[greenstevens@gmail.com](mailto:greenstevens@gmail.com)>  
**Subject:** Climate 2023 Rulemaking

You don't often get email from [greenstevens@gmail.com](mailto:greenstevens@gmail.com). [Learn why this is important](#)

DEQ's program rules need to enforce strong compliance and reporting obligations for regulated gas utilities and industry, to ensure that Oregon can meet its stringent goals for reducing GHG emissions while delivering the maximum public health and economic benefits for Oregonians, especially in underserved communities.

The Climate 2023 Rulemaking should:

- Ensure direct benefits for Oregon communities by only allowing biomethane (aka Renewable Natural Gas) compliance credits for production within Oregon, not from out-of-state.
- Restrict hydrogen for CPP compliance unless DEQ ensures it is green electrolytic hydrogen. Other hydrogen sources and types are far more polluting, with more risks for our energy system.
- Strengthen emissions reduction requirements for industries

I have served on the Climate Action Advisory Board for the City of Corvallis for several years. As a city, we count on the DEQ, DOE and State Legislators to provide leadership and parameters to reduce a large portion of the GHG gasses emitted by our community, knowing that we have roles to play on the local level, as well. Without strong regulations at the state level, we are left with very difficult means to reach our CO2 reduction goals.

Please rise up and resist the influence of the fossil fuel industry.

Thank you.  
Marjorie Stevens  
1214 NW 12th St  
Corvallis OR 97330

[greenstevens@gmail.com](mailto:greenstevens@gmail.com)

541-602-9971

Member, Corvallis League of Women Voters

CLIMATE WRITERS

Clarkson  
86083 Cherokee Dr  
Eugene OR 97402

October 3,

Dear Nicole Singh:

Governor Brown's Executive Order 20-04  
has been usurped by a committee  
with selfish interests. Please ignore  
efforts by gas utilities to define  
methane (renewable natural gas) as an  
offset for Oregon's natural gas (methane).

We need to return to the original  
Climate Protection Plan!

Alfred P. Clarke

Erin O'Syng  
Peter Degroot

Martha Dragovic

Marie-Hélène O'Byrne

M. Gessert  
Kate Gessert

CLIMATE WRITERS

Clarkson  
86083 Cherokee Dr  
Eugene OR 97402

October 3,

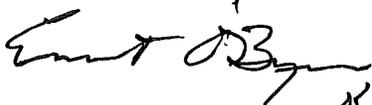
Dear Elizabeth Eibel:

Governor Brown in 2020 had good intentions with Executive Order 20-04 but the rule making advisory committee did not. Please ignore efforts by gas utilities to define methane (renewable natural gas) as offsets for natural gas (methane). We need to return to the original climate protection plan!

  
Peter Dragovic

Maitha Dragovic  
Marietta O'Byrne

M. Gessert



Kate Gessert

C L I M A T E   W R I T E R S

86070 Cougar Lane  
Eugene, OR. 97402

Oregon DEQ  
700 NE Multnomah St., Room 600  
Portland,  
OR. 97232-4100

Oct. 4, 2023

Dear Elizabeth Elbel and Nicole Singh:

Governor Brown took climate change seriously when she signed Executive Order 20-04. However, the rule-making advisory committee on the DEQ's Greenhouse Gas Reporting Program, apparently thinks climate crisis can be willed away with words. Efforts by gas utilities to define out-of-state "Renewable" natural gas (methane) as offsets for in-state natural gas (methane) is down accountability. We need a steep downward trajectory in emissions, not games with numbers. Return to the original Climate Protection Plan.

M. Jesselt

Peter Dragovic

Martha Dragovic

Marie-Hélène O'Byrne

Jeffrey A. Carter

Ernest O'Brien

Kate Jesselt

DEPT OF ENVIRONMENTAL QUALITY  
RECEIVED

OCT -9 2023

NORTHWEST REGION

Sept 15, 2023

Attention:

Elizabeth Elbel + Nicole Singh,

Allowing out of state  
Renewable Natural Gas as  
a substitute for reducing  
emissions in our state  
will undermine the  
Climate Protection Program  
and harm Oregonians.

I urge the DEQ to require  
new + expanding polluters to  
follow the same pollution rules  
as existing facilities.

Sincerely



Jemma T. Crag  
6018 Coos Bay  
Wagon Rd.  
Roseburg, OR 97471

October 10, 2023

Oregon Department of Environmental Quality  
Attn: Elizabeth Elbel and Nicole Singh  
700 NE Multnomah St., Room 600  
Portland, OR 97232-4100

**RE: 2023 Climate Rulemaking Comments from Concerned Workers and Business Leaders**

We – the organizations that represent highly skilled workers and diverse industries that make up Oregon’s economic engine – appreciate the opportunity to provide public comments on DEQ’s proposed changes to the Greenhouse Gas Reporting Program (Division 215) and the Climate Protection Program (Division 271).

Though our groups represent a wide range of industries and perspectives, we are unified in a common concern about cost impacts to our state’s workforce and families. We urge DEQ to help keep costs down by using the most effective and efficient ways to reduce emissions.

- We support decarbonized fuels – like renewable natural gas – as tools for reducing emissions, including from sources outside of Oregon.
- Decarbonized fuels provide tangible greenhouse gas savings by displacing the use of more carbon intensive fuels, regardless of the end use location or a pipeline connection to Oregon. Reducing emissions anywhere, within Oregon or otherwise, creates a climate benefit everywhere, including for Oregonians.
- Imposing arbitrary geographic limits on where environmental attributes can be procured harms rather than helps Oregonians. This would be akin to excluding wind and solar resources from outside of Oregon – which would prevent us from meeting our clean electricity goals.
- Limitations will increase compliance costs under the Climate Protection Program. As a business operating in Oregon, we are concerned with efficiency and cost. It is important that real carbon reductions are achieved by the Climate Protection Program in the most cost-effective manner.
- Proven and auditable carbon accounting methods are important. The standard book and claim accounting methodology for decarbonized fuel use from across North America provides a mechanism for proper greenhouse gas accounting under the Greenhouse Gas Reporting Rule while controlling costs.

**Please control for costs.**

Increasing decarbonized fuel supply decreases costs, which is why we urge DEQ to be consistent with other carbon markets and programs by **not** arbitrarily including geographic limitation on biomethane and renewable natural gas in the Climate Protection Program and Greenhouse Gas Reporting Rule.

Sincerely,

Edward C Cranston  
President  
Cranston Machinery Co. Inc

**Pamela de Jong**  
**2150 Pine St.**  
**North Bend, OR 97459**  
**541-404-8894**  
**pamiedejong@yahoo.com**

October 8, 2023

Oregon Department of Environmental Quality  
Attn: Elizabeth Elbel and Nicole Singh  
700 NE Multnomah St., Room 600  
Portland, OR 97232-4100

RE 2023 Climate Rulemaking Comments

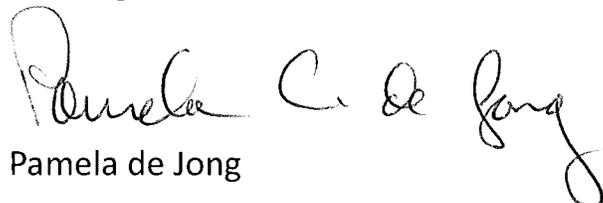
As an individual citizen from North Bend Oregon in Coos County, I am happy to comment on DEQ's proposed changes to the Greenhouse Gas Reporting Program (Division 215) and the Climate Protection Program (Division 271).

I understand we need to reduce our emissions. However, in the process of reducing emissions, we must focus on economic development and jobs as well as cost and cost effectiveness for our communities and families.

Absolutely, I support decarbonized fuels – such as renewable natural gas – as part of how we reduce emissions both within and outside of Oregon. Decarbonized fuels will create a climate benefit everywhere regardless of end use. Any limitations we put on the process, will increase compliance costs which would be detrimental to the program. Using proven and auditable carbon account methods are imperative for both the reporting process and controlling the costs.

***Please center costs, cost effectiveness, and efficiency in your decision making.***

Best regards,



Pamela de Jong



September 12, 2023

Oregon Department of Environmental Quality  
Attention: Elizabeth Elbel and Nicole Singh  
700 NE Multnomah Street  
Suite 600  
Portland, Oregon 97232-4100

The Douglas County Global Warming Coalition, an all-volunteer grassroots organization representing approximately five hundred members in our community, offers the following comments on the proposed rules regarding biomethane (RNG) and stationary source emissions.

In order to safeguard the integrity and overall intent of the Climate Protection Program, it is essential to reject the use of out of state biomethane as an offset to in-state emissions produced by natural gas companies. Embracing RNG as an alternative to lowering in-state emissions will jeopardize Oregon's ability to meet the emission reduction goals set forth in the Climate Protection Program. It will ensure that Oregonians will bear the brunt of in-state climate pollution. Compounding the problem is the fact that DEQ has limited ability to accurately monitor and verify the actual emission reductions asserted by out of state RNG. In addition, studies conducted by NASA with Duke, Harvard and Brown Universities have demonstrated that the most modest leakage of methane results in this fossil fuel being as detrimental to the climate as coal.

In regards to stationary sources, new and expanded facilities must fall under the same regulatory requirements as existing ones. To allow otherwise creates a loophole which will prevent the Climate Protection Program from meeting its short and long term greenhouse gas reduction goals. These scientifically based targets are essential to Oregon doing its share to address the climate crisis.

The Douglas County Global Warming Coalition strongly urges the DEQ to disallow out of state RNG as an offset to in-state climate pollution and to hold new and expanded stationary sources to the same standards as existing ones.

Sincerely,

The Board of the Douglas County Global Warming Coalition

Polly Stirling  
Diana Bailey

Melanie MacKinnon  
Stuart Liebowitz

Scott McKain  
Liz Gayner

14 September, 2023

Oregon DEQ  
Attn: Elizabeth Eljel  
Nisale Single  
700 NE Multnomah St, Ste 600  
Portland, Oregon 97232-4100

To Whom it may Concern:

We are all so lucky that we have a Climate Protection Program in the state of Oregon. Thank you for your efforts in this project.

Now, however, we are told that our Climate Protection Program will permit out of state "nonrenewable" natural gas to be used by industrial entities in place of lowering our gas usage. This is unacceptable.

We must not allow states to shuffle gas back and forth so that it "appears" we are using less gas. Overall usage in Oregon and elsewhere, must be reduced.

O V S W

Thus natural gas must never be considered "renewable." Fossil fuels burned anywhere affect the climate everywhere.

Anything else is tantamount to rearranging the deck chairs on the Titanic. There simply cannot be any renewable natural gas if we are to meet our necessary climate goals.

Thank you

William R. Johnson

September 12, 2023

Oregon DEQ  
Attention: Elizabeth Elbel and Nicole Singh  
700 NE Multnomah Street  
Suite 600  
Portland, Oregon 97232-4100

I am writing to express my strongest concern regarding proposed rules governing biomethane and emissions from stationary sources. The Climate Protection Program is a landmark achievement in the effort to address the climate crisis. However, the proposed rules in these two areas will undermine and severely compromise the integrity of this program.

Specifically, it is imperative to disallow any out of state biomethane (RNG) to substitute for in-state emissions reductions from natural gas. To do otherwise means that Oregonians will continue to suffer the impacts of these dirty emissions. Moreover, by allowing out of state RNG to offset in-state emissions, DEQ is beholden to out of state regulatory entities to measure these emissions. It is critical to recognize that RNG is a dirty fuel and a loophole such as this will undermine the intent of this important program. Further, a recent study by NASA in conjunction with Harvard, Duke and Brown Universities has shown that a leakage of methane as little as 0.2% makes this fossil fuel dirtier than coal - a figure that is easily exceeded. It is true that DEQ has no jurisdiction over leakage; however that is precisely the point. Since DEQ is unable to monitor this source of emissions, it argues even more strongly to reject RNG as an acceptable offset to in-state pollution.

In regards to stationary sources, it is equally imperative to ensure the integrity of this program by holding new and expanded facilities to the same rigorous standards that currently apply to existing ones. To do otherwise subjects this program to an ongoing loophole that will prevent the CPP from reaching its goals essential to bringing the climate crisis under control.

To safeguard the integrity of this program, I strongly urge the DEQ to disallow out of state biomethane as a substitute for in state pollution and hold new and expanded stationary sources to the same standards as existing ones.

Sincerely,



Stuart Liebowitz  
143 SE Lane Avenue  
Roseburg, Oregon 97470

September 14, 2023

Oregon DEQ  
Attention: Elizabeth Elbel and Nicole Singh  
700 NE Multnomah Street  
Suite 600  
Portland, Oregon 97232-4100

Oregon DEQ's Climate Protection Program is a major step forward toward reducing Oregon's CO2 emissions. Two changes to the rules are necessary to ensure the Program's goals are met:

- 1) Natural gas utilities must not be allowed to purchase dubious out of state RNG credits to meet their obligations to reduce their Oregon pollution. They must make investments that benefit Oregonians.
- 2) New and expanding stationary sources must be subject to the same rigorous standards that currently apply to existing industrial sites. Otherwise they pose a threat to achieving Oregon's CO2 emissions reduction goal.

Thank you for your consideration of these changes.

Yours truly,  
*Polly Stirling*  
Polly Stirling  
143 SE Lane Avenue  
Roseburg, OR 97470

Trudy Wilkinson  
150 Steelhead Drive  
Elkton, Or. 97436

Dear Elizabeth and Nicole,

I am writing you concerning the need to stop climate pollution in Oregon. Allowing out of state Renewable Natural Gas as a substitute for reducing emissions in our state will undermine the Climate Protection Program and harm Oregonians.

I also urge you to require new and existing industrial polluters to follow the same pollution rules as existing facilities. Thank you -  
Trudy Will

Dear DEQ,

October 10, 2023  
Climate protection plan

Let's steward the land, people, and livelihoods of Oregon by establishing policy that strengthens emissions reduction requirements for new or expanded large industrial facilities, as promoted in the CPP. As a key department in the hands on front line work of setting the policy for a change in how we protect the land, air, and water, I am asking you to ensure that the CPP stays on track to deliver its stated climate goals and public health, economic, and employment benefits for environmental justice in all of our communities in Oregon.

The CPP is the product of a decision making process that considers long term impacts of today's policy choices. As a public school teacher I know the damage and set backs that result from institutional overhauls that are tinkered with before they have enough time to start working effectively.

Now is not the time to change course and capitulate to the short term interests of the oil and gas industry. I implore you to think long term, set policy using the CPP and support it while it begins to create the changes we want to see in the health & welfare of Oregon.

Thank you,  
Amanda Yampolsky