

The League of Women Voters of Oregon, established in 1920, is a grassroots nonpartisan political organization that encourages informed and active participation in government. We envision informed Oregonians participating in a fully accessible, responsive, and transparent government to achieve the common good. LWVOR Legislative Action is based on advocacy positions formed through studies and member consensus. The League never supports or opposes any candidate or political party.

May 14, 2024

To: [Nicole Singh](#), DEQ, Senior Climate Change Policy Advisor

Re: Climate Protection Program (CPP) 2024 Proposed Rulemaking - **Comments**

The League of Women Voters believes climate change is a serious threat facing our nation and planet and supports climate goals consistent with the best available science to ensure a stable climate system for future generations. The League advocates in favor of laws, regulations, and policies to mitigate climate change and its impact.

We have participated actively in the CPP rulemaking since its inception in 2021, and strongly support the program's primary goals of achieving significant reductions in greenhouse gas (GHG) emissions; promoting benefits and alleviating burdens for environmental justice communities; and containing costs for businesses and consumers.

The Oregon Court of Appeals decision invalidating the CPP on the basis of a procedural technicality overturned many months of work by climate advocates and others to implement a fair and effective program that would secure public health and economic benefits for all Oregonians. In seeking to restore the CPP, DEQ's 2024 rulemaking offers opportunities to strengthen this cornerstone program beyond the rules that were in place at the end of 2023. Below, we highlight several key topics.

- **Emissions Cap:** The reinstated program must maintain, or preferably strengthen, the science-based emissions cap and trajectory established in the previously adopted rules. This is imperative to make up for GHG emissions that were not reduced in the years when the CPP should have been in place. To get Oregon's cumulative emission reductions back on track, DEQ should use a lower starting emissions cap for 2025 and every year thereafter.
- **Community Climate Investments (CCIs):** We urge DEQ to maintain an effective CCI program that will enable environmental justice and community-based organizations to proceed with the emissions-reducing projects and investment options they have identified. Specifically, we oppose reducing the price of CCIs and allowing offset investments by the regulated entities—particularly investments outside of Oregon—as a means of program compliance.
- **Stationary Sources:** We have consistently expressed our concern that the previously adopted rules exempted large stationary sources from binding requirements to reduce emissions, in favor of regulating emissions through an ineffective Best Available Emissions Reduction approach. The 2024 rulemaking gives DEQ an opportunity to ensure that the CPP deters expansion of existing sources or development of new sources of process-based GHG emissions. Once again, we urge DEQ to amend the rules to bring large industrial source emissions under the cap.

Thank you for the opportunity to discuss this rulemaking.



Rebecca Gladstone
President LWVOR



Claudia Keith
Climate Emergency Coordinator