



The League of Women Voters of Oregon is a 102-year-old 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.

October 21, 2022

To: Levzev2022@deq.oregon.gov

Re: Comments on Proposed Rules for Advanced Clean Cars II

The League of Women Voters of Oregon believes that climate change is a serious threat facing our nation and planet. The League believes that an interrelated approach to combating climate change—including through energy conservation, air pollution controls, building resilience, and promotion of renewable resources—is necessary to protect public health and defend the overall integrity of the global ecosystem. The League supports efforts to secure equal rights and equal opportunity for all and promote social and economic justice and the health and safety of all Americans.

The League of Women Voters has taken positions in support of the use of renewable resources, including our testimony on behalf of HB 2021. We also supported HB 4077, which defined the Environmental Justice Communities as including “communities of color, communities experiencing lower incomes, communities experiencing health inequities, tribal communities, rural communities, remote communities, coastal communities, communities with limited infrastructure and other communities traditionally underrepresented in public processes and adversely harmed by environmental and health hazards, including seniors, youth and persons with disabilities.”

We appreciate this opportunity to comment on the “Notice of Proposed Rulemaking” for the Clean Fuels Program Expansion 2022 as published by the Department of Environmental Quality (DEQ). The League supports the incorporation of the updated California rules by Oregon but has some serious concerns with the “Racial Equity Impact Statement.”

It has become obvious that the effects of climate change are already having a significant effect on Oregon and will continue to get significantly worse without action being taken. Since transportation is our major contributor to greenhouse gas emissions, we consider the electrification of the sector with the clean electricity provided by HB 2021 to be desirable.

Oregon has adopted California’s emission vehicle rules since 2005 with emission standards in place through the 2025 model year. These rules are primarily updates to the existing Oregon rules to extend them to 2035 with the California targets. We checked the cases where the Oregon rules explicitly specified certain subsections that are not incorporated by reference. They were cases where specific California implementations were given; new Oregon-specific text has been. New sections were added for post-2025 “NMOG + NOx exhaust emissions” because the new California rules moved these to a new section.

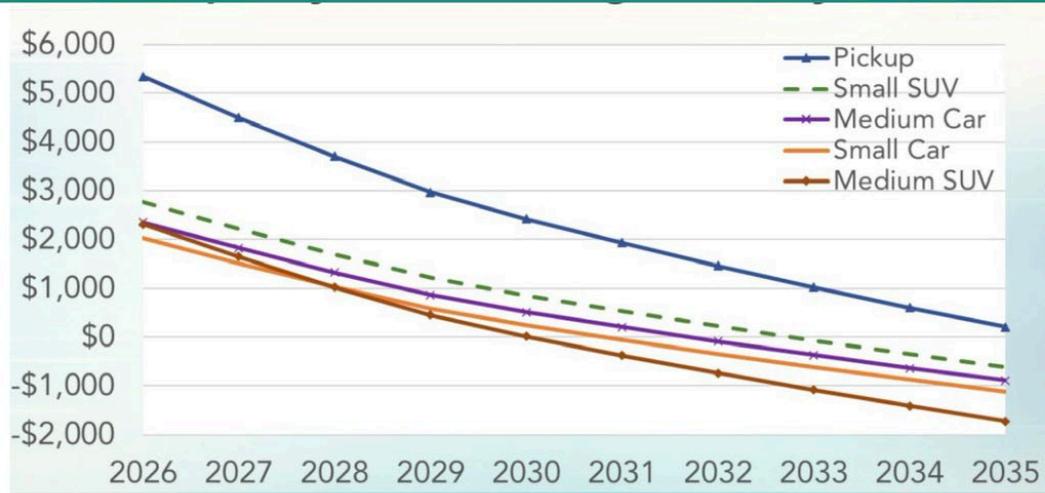
However, we were disappointed in the “Racial Equity Impact Statement; it should be the “Environmental Justice Impact Statement.” We do consider that the rules take the environmental justice concerns of those living in urban and suburban area into account with the community-based clean mobility program and the effort to make sure used vehicles are likely to be usable for an extended period.

However, we do not consider that the concerns of other EJ communities have been adequately considered. The solutions proposed for community-based clean mobility programs are not applicable in rural, remote,

and coastal communities, and public charging stations are likely to be sparsely located. Youth, seniors, and persons with disabilities make use of multi-passenger vehicles for their transport. These services are frequently provided by non-profit organizations, so cost is a major concern.

The rebates are the same for pickup trucks and minivans as for other passenger vehicles, while they are more expensive. The chart provided at the RAC meetings shows that electric pickup trucks are not in parity with the corresponding non-electric vehicles by 2035. Minivans are not even shown on the chart. There are not nearly as many zero-emission and plug-in hybrids being proposed as there are passenger cars and SUVs.

Cost parity for electric vehicles



Slide: CARB

We recognize there are limitations to what can be done because of the requirement to adopt the California rules. However, we request that DEQ consider additional mitigations for all of the environmental justice communities.

Thank you for this opportunity to provide comments.

Rebecca L. Gladstone

Rebecca Gladstone
LWVOR President

Claudia Keith

Claudia Keith
Climate Emergency Coordinator

Kathy Moyd

Kathy Moyd
Climate Emergency Portfolio