



The League of Women Voters of Oregon is a 100-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.

January 27, 2020

To: Greenhouse Gas Reporting and Third-Party Verification, Oregon DEQ
Elizabeth Elbel, Greenhouse Gas Rulemaking,
ghg2019@deq.state.us

Re: **Greenhouse Gas Reporting and Third-Party Verification 2019, Rulemaking – Support**

The League of Women Voters believes that climate change is a serious threat facing our nation and our 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 climate goals and policies that are consistent with the best available climate science and that will ensure a stable climate system for future generations. Individuals, communities and governments must continue to address this issue, while considering the ramifications of their decisions, at all levels—local, state, regional, national, and global.

The League of Woman Voters of Oregon supports DEQ’s proposed rulemaking as outlined below:

1. Modify the Greenhouse Gas Reporting Program (Division 215) to incorporate existing reporting and emissions accounting protocols into rule. This would improve DEQ’s ability to assess state greenhouse gas emissions and track progress towards meeting the emission reduction goals adopted by the Oregon Legislature.
2. Streamline the reporting requirements of the Greenhouse Gas Reporting Program (Division 215) and the Clean Fuels Program (Division 253) to enable entities subject to both programs to report into a single online system.
3. Propose a new Division 272 to require that some data submitted to DEQ for compliance with the Greenhouse Gas Reporting Program and the Clean Fuels Program be verified by independent third-parties.
4. Amend Division 12 to classify certain violations and establish or clarify enforcement criteria for violations of the Greenhouse Gas Reporting Requirements.

Oregon needs emission data to assess our state's contribution to climate pollution. Greenhouse gas emissions reduction programs depend on accurate data to assess their efficacy; third-party verification and enforcement are integral to confidence in the reliability of that data. These measures will allow industries to examine production processes and focus on decreasing emissions while maintaining or increasing productivity.

Thank you for the opportunity to support these modifications to the DEQ greenhouse gas reporting rules and third-party verification.

A handwritten signature in black ink that reads "Rebecca L. Gladstone".

Rebecca Gladstone
LWVOR President

A handwritten signature in black ink that reads "Julie Chapman".

Julie Chapman
LWVOR Climate Change Portfolio