

June 25-26, 2020 Energy Facility Siting Council Meeting
Agenda Item E: Carbon Monetary Offset Rate Update
Attachment 2: Public Comments
Updated June 25, 2020 (Final)

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CLARK Christopher * ODOE

From: Glenn Sonne <sonneg@hotmail.com>
Sent: Tuesday, May 26, 2020 1:32 PM
To: EFSC Rulemaking * ODOE
Subject: Carbon offsets on Natural Gas powerplants

I am opposed to any variable price on Carbon Offsets. Logically a power provider needs years of economic projects to even plan a power plant.

How can any company invest in Oregon with sliding economic charges? How can residents have faith in a government with a sliding scale on pricing on their power?

Sooner or later the public will realize if this sliding scale continues, that this is more about government income than about the ecology... it sure looks that way. The optics are TERRIBLE!

Glenn Sonne
Gold Hill Oregon

Sent from my iPad

CLARK Christopher * ODOE

From: Jynx Houston <jynxcd@gmail.com>
Sent: Tuesday, May 26, 2020 5:01 PM
To: EFSC Rulemaking * ODOE
Subject: OFFSET RATE FOR EMISSIONS

It is critical that the offset rate for CO2 emissions be far higher than it currently is. It's the only responsible way to diminish excessive emissions as all parties are only too aware.

Jynx Houston
7605 SE Lincoln St.
Portland, OR 97215

CLARK Christopher * ODOE

From: Allyson Dugan <aidugan@umich.edu>
Sent: Friday, June 12, 2020 1:18 PM
To: EFSC Rulemaking * ODOE
Subject: Increase Carbon Offset Rate OAR 345-024-0580

Hello,

I am a resident of NW Portland and registered voter in Oregon. I am writing regarding the proposed increase to the Carbon Monetary Offset Rate in OAR to 345-024-0580 from \$1.90 to \$2.85. I am writing to strongly encourage the Energy Facility Sitting Council to increase the cost of CO2 offsets. The long-term costs of climate change are well known and we must take all measures we can to incentivize reducing CO2 emissions.

I am also writing to encourage the council to NOT extend the DEQ air quality permit for the Perennial Wind Chaser gas plant project that is set to expire in July 2020. This project is an inefficient, water-intensive, and short-sighted plan to deal with peak demands. They have not had any interested purchasers of their power, further showing that this plant is not needed and not wanted.

I encourage the Energy Facility Sitting council to consider long-term environmental and societal benefits when voting on the above measures.

Thank you,

--

Allyson Dugan
2046 NW Flanders St

From: [Linda Reedijk](#)
Sent: Tuesday, June 23, 2020 10:25 PM
To: [EFSC Rulemaking * ODOE](#)
Subject: Comment on Carbon Offset Rate Update

Dear Members of the Oregon Energy Facility Siting Council and Staff,

I strongly support the staff's recommendation to strengthen Oregon's carbon dioxide standard.

- The proposed rule increases the Carbon Monetary Offset Rate in OAR [345-024-0580](#) from \$1.90 to \$2.85, the highest increase allowed under Oregon's current rules
- The rule is consistent with the purpose of Oregon's carbon dioxide standard, which seeks to make gas-fired power plants as efficient as possible and to offset excess carbon dioxide.
- The rule is also consistent with Oregon Governor Brown's Executive Order No. 20-04, which states that "agencies shall exercise any and all authority and discretion vested in them by law to help facilitate Oregon's achievement of the GHG emission reduction goals set forth in...this Executive Order."
- EFSC staff demonstrate that the proposed rule is a reasonable way to bring Oregon's monetary offset cost closer to the actual, real-world cost of carbon offsets paid by the Climate Trust and others.
- I agree with EFSC's findings that the proposed rules and increase in the monetary offset rate are reasonable and fiscally achievable.
- Additionally, carbon reductions that may occur as a result from this rule will benefit society, and I support EFSC's staff's use of the Social Cost of Carbon in reaching this conclusion.
- The proposed rule takes an important step towards forcing new potential fracked gas power plants to recognize and internalize the costs of the carbon pollution they generate.

[Sent from Yahoo Mail for iPhone](#)

From: veronica poklemba <ronnie717@comcast.net>
Sent: Wednesday, June 24, 2020 2:54 PM
To: EFSC Rulemaking * ODOE
Subject: Comment on Carbon Offset Rate update

Dear Members of the Council and Staff:

I strongly support the staff's recommendation to strengthen Oregon's carbon dioxide standard.

Thank you for your hard work in this area.

Veronica Poklemba
Portland, OR 97206

CLARK Christopher * ODOE

From: Noelle Smith <noellensmith573@gmail.com>
Sent: Wednesday, June 24, 2020 4:08 PM
To: EFSC Rulemaking * ODOE
Subject: Strengthen Oregon's Carbon Dioxide Standard!

Dear folks on the Oregon Energy Facility Siting Council and Staff,

I strongly support the staff's recommendation to strengthen Oregon's carbon dioxide standard for the following reasons:

- The proposed rule increases the Carbon Monetary Offset Rate in OAR 345-024-0580 from \$1.90 to \$2.85, the highest increase allowed under Oregon's current rules
- The rule is consistent with the purpose of Oregon's carbon dioxide standard, which seeks to make gas-fired power plants as efficient as possible and to offset excess carbon dioxide.
- The rule is also consistent with Oregon Governor Brown's Executive Order No. 20-04, which states that "agencies shall exercise any and all authority and discretion vested in them by law to help facilitate Oregon's achievement of the GHG emission reduction goals set forth in...this Executive Order."
- EFSC staff demonstrate that the proposed rule is a reasonable way to bring Oregon's monetary offset cost closer to the actual, real-world cost of carbon offsets paid by the Climate Trust and others.
- I agree with EFSC's findings that the proposed rules and increase in the monetary offset rate are reasonable and fiscally achievable.
- Additionally, carbon reductions that may occur as a result from this rule will benefit society, and I support EFSC's staff's use of the Social Cost of Carbon in reaching this conclusion.
- The proposed rule takes an important step towards forcing new potential fracked gas power plants to recognize and internalize the costs of the carbon pollution they generate.

Thank you for your consideration,

-Noelle Smith

--

Noelle Smith
she/her
noellensmith573@gmail.com
(507) 573-2326



Columbia Riverkeeper
401 Portway Avenue, Suite 301
Hood River, OR 97031
phone 541.387.3030
www.columbiariverkeeper.org

June 24, 2020

EFSC Rules Coordinator
Oregon Department of Energy
550 Capitol St. NE
Salem, OR 97301

Submitted to: EFSC.rulemaking@oregon.gov

RE: Carbon Offset Rate Update

Dear Oregon Energy Facility Siting Council:

Columbia Riverkeeper, Human Access Project, Center for Sustainable Economy, Cascadia Wildlands, Rogue Climate, Northwest Environmental Defense Center (NEDC), Friends of the Columbia Gorge, Green Energy Institute, Oregon Physicians for Social Responsibility, and the Power Past Fracked Gas Coalition strongly support the proposal by the Oregon Energy Facility Siting Council (EFSC) to increase the Carbon Monetary Offset Rate in OAR 345-024-0580 from \$1.90 to \$2.85. The proposed change will increase the effectiveness of Oregon's carbon dioxide standard while working towards Oregon's larger goals of reducing greenhouse gas emissions.

The new rule is consistent with the purpose of Oregon's carbon dioxide standard, which seeks to ensure that proposed facilities avoid, displace, or sequester a portion of the carbon dioxide emissions they produce over an assumed 30-year facility life span. EFSC staff have demonstrated that Oregon's offsets are currently underpriced. EFSC staff report that the "average negotiated price of offsets negotiated by (The Climate Trust) as of December 31, 2019 was \$6.00 per ton of CO₂e," far above the current \$1.90/ton rate charged under Oregon's carbon dioxide standard.¹ By bringing the cost of monetary offsets more into alignment with the actual price of offsets paid by the Climate Trust and others, the new rule makes Oregon's carbon dioxide standard more effective in achieving its goal of reducing carbon dioxide emissions.

¹ EFSC Staff Report. April 10, 2020. Agenda Item D (Action Item). 2020 Carbon Offset Rate Update (R203). Council Initiation of Rulemaking for the April 24, 2020 EFSC Meeting. P. 3.

The Council is wise to take this opportunity as a step towards ensuring that the funds provided to meet the carbon standard are sufficient to produce a reduction in greenhouse gas emissions that is commensurate to the amount of carbon dioxide emissions a proposed fossil fueled power plant would otherwise have to avoid, displace, or sequester to meet the Council's standard. Even with the proposed rate change, it appears that Oregon's carbon offset rate will remain underpriced. According to EFSC staff, "If the monetary offset rate were increased to \$2.85 per ton of CO₂e in 2020, the maximum increase allowed by statute, the rate will still be less than half of the average price negotiated by (The Climate Trust). The rate would also be below the average price in the global voluntary market, which was \$3.32 per ton of CO₂e in 2018."² EFSC's proposed rule is important and urgent to begin to bring Oregon's carbon offset rate closer to the actual cost paid by The Climate Trust as quickly as possible, recognizing that, by statute, the rate can only be increased by 50% every two years.

The proposed rule also resonates with Oregon Governor Brown's Executive Order No. 20-04, which states that "agencies shall exercise any and all authority and discretion vested in them by law to help facilitate Oregon's achievement of the GHG emission reduction goals set forth in...this Executive Order." EFSC staff demonstrate that the proposed rule is a reasonable way to bring Oregon's monetary offset cost closer to the actual, real-world cost of carbon offsets paid by the Climate Trust and others. In its May 2020 Executive Order 20-04 Implementation Report, the Oregon Department of Energy stated that the revised monetary offset rate for the carbon dioxide standard will "result in a greater proportion of the excess carbon dioxide emissions of (facilities) being offset."³ We agree with this assessment.

We support EFSC staff's findings that the proposed increase in the monetary offset rate is reasonable and fiscally achievable. By evaluating the actual cost to new gas-fired power plants and the expected per megawatt hour price increase from offset costs—assuming these costs are passed through in energy prices—EFSC staff have demonstrated that the increase in costs associated with the proposed rule are modest. The Notice of Proposed Rulemaking explains that the fiscal impact of the rate increase is reasonable, stating,

The proposed rule change is expected to increase costs of developing a new natural-gas fired power plant by about 1.5%. On average, this will result in an increased cost of about \$0.15 for each megawatt hour of net electrical output a new natural-gas fired power plant is projected to produce. Based on the average cost of offsets negotiated by The Climate Trust, the additional \$0.15 per megawatt hour would also increase the actual amount of greenhouse gasses reduced with offset funds by an average of around .0257 tons per megawatt hour. Assuming a Social Cost of \$58 per ton of carbon dioxide, we estimate the

² *Id.* at 3.

³ Oregon Department of Energy. May 2020. Executive Order 20-04 Implementation Report. <https://www.oregon.gov/energy/energy-oregon/Documents/2020-05-15-EO2004-Implementation-Report.pdf> p. 11

rate increase will result in a net social benefit of \$1.33 per megawatt hour produced by any new natural-gas power plant constructed in Oregon.⁴

Additionally we support the Staff's conclusion that carbon reductions that may occur as a result from this rule will benefit society. EFSC's staff correctly use the Social Cost of Carbon in reaching this conclusion. EFSC could also take note of the State of Oregon's commitment to support the Paris Climate Accord, which puts a premium on reducing carbon pollution because of the urgent need to limit global warming to 2 degrees Celsius or less. The Governor's Executive Order 20-04 explains,

... the Intergovernmental Panel on Climate Change has identified limiting global warming to 2-degrees Celsius or less as necessary to avoid potentially catastrophic climate change impacts, and remaining below this threshold requires accelerated reductions in GHG emissions to levels at least 80 percent below 1990 levels by 2050; and

... Oregon, as a member of the U.S. Climate Alliance, has committed to implementing policies to advance the emissions reduction goals of the international Paris Agreement, and

... GHG emissions present a significant threat to Oregon's public health, economy, safety, and environment...⁵

Consistent with Oregon's commitment to advance the emissions reduction goals put forward in the Paris Agreement, and supported by EFSC staff's Social Cost of Carbon analysis, the proposed rule takes an important step towards forcing new potential fracked gas power plants to recognize and internalize the costs of the carbon pollution they generate.

We appreciate the work that EFSC staff and the Council have undertaken in bringing this proposed rule change forward quickly. This relatively modest change to Oregon's siting standards will have a positive impact in accelerating Oregon's effort to curb greenhouse gas pollution. We urge EFSC to approve the rate change as proposed.

Sincerely,

Dan Serres

⁴ Oregon EFSC. May 2020. Notice of Proposed Rulemaking. P. 2.

⁵ Executive Order 20-04. March 2020. Page 1.

<https://drive.google.com/file/d/16isLO3GTqxVihqhhIcjGYH4Mrw3zNNXw/view>

Conservation Director, Columbia Riverkeeper
Co-Director, Power Past Fracked Gas Coalition

On behalf of:

Human Access Project

Center for Sustainable Economy

Cascadia Wildlands

Rogue Climate

Northwest Environmental Defense Center (NEDC)

Friends of the Columbia Gorge

Oregon Physicians for Social Responsibility

Green Energy Institute

Power Past Fracked Gas Coalition

June 25, 2020

Councilor Hanley Jenkins II, Chair
Energy Facility Siting Council
Oregon Department of Energy
550 Capitol St. NE
Salem, OR 97301

Dear Chair Jenkins,

Thank you for the opportunity to provide public comment on the Energy Facility Siting Council (EFSC) proposed rules to increase the monetary offset rate for carbon dioxide emissions from new energy facilities under OAR 345-024-0580. The proposed amendment will increase the monetary offset rate from \$1.90 to \$2.85 per ton of carbon dioxide, a 50 percent increase. Cascade Policy Institute (Cascade) is a nonpartisan, nonprofit research and education organization that is committed to protecting Oregon ratepayers from excessive and needless rate increases. Cascade opposes this rate increase.

Staff estimated that increasing the monetary offset rate from \$1.90 to \$2.85 would increase the costs of developing a new natural gas-fired plant by around 1.5%. This in turn will increase the cost of electricity produced by a new natural gas plant by an average of approximately \$0.15 per MWh. This cost will be passed down to ratepayers by utilities.

The Council *may* increase or decrease the monetary offset rate by up to 50 percent every two years. It is certainly not required of the council, and just because one has the power to do something, does not mean one always should. Oregonians are struggling in the midst of a global pandemic. COVID-19 has shuttered businesses across the state and unemployment is at a historic high of nearly 20%. Low income households are falling behind on their energy bills right now and more individuals are becoming energy burdened. Portland General Electric (PGE) stated in a PUC meeting on June 16, 2020 that arrears were up 41% in June compared to this time last year. NW Natural Gas and Cascade Natural Gas are also seeing more customers in arrears than normal. Arrears are increasing across the board because customers cannot manage their bills.

COVID-19 won't be going away anytime soon, and neither will this recession. While the actual impact on ratepayer bills will likely be minimal (less than a 1 percent increase), given the financial state of our economy it is shocking and cruel that the EFSC is considering engaging in rulemaking that will increase ratepayer bills at all.

Based on the Rate Rulemaking Staff Report, it appears that staff is basing their recommendation to Council on the mere fact that the monetary offset rate under OAR 345-024-0580 differs from the average negotiated price of offsets by The Climate Trust. However, the monetary offset rate has differed from the average market carbon offset price since this program's inception. In their report, Staff focus more on what the actual offset rate should be instead of whether the Council should increase the offset rate at all. Cascade Policy Institute urges the council to reject staff's proposal to increase the monetary rate due to insufficient reasoning and a lack of urgency.

ORS 469.503(2)(c)(C) requires the Council to find the new monetary carbon offset rate is financially achievable. However, staff presented no evidence or information regarding whether the new rate increase will be economically viable for future plants. The recommendation's conclusion is merely based on Staff's estimation of how the new rate increase would have changed the cost of offsets for a previously constructed natural gas plant, an assumption Staff, and not those financing the plants, assume is reasonable. Staff admitted that it is possible some small businesses involved in developing the new facilities could be directly affected by the rate increase, but no analysis or information is provided demonstrating what that impact will be and whether or not it will be economically achievable for those businesses.

The goal of placing the carbon dioxide emissions standard at 17 percent below the rate of the most efficient energy facility was to incentivize utilities to develop increasingly efficient natural gas facilities. It is true that natural gas facilities are becoming more efficient, however, no evidence has been presented linking this innovation to OAR 345-024-0580. In fact, PGE stated in testimony submitted to the Council in 2017 that increased efficiency is linked to a fundamental shift in natural gas technology, the adoption of Oreogn's Renewable Portfolio Standard, and a decrease in the price for renewable energy facilities. Thus, this rate increase will only serve to increase the cost of energy to ratepayers.

Given recent carbon reduction policies and the COVID-19 crisis, Cascade Policy Institute respectfully requests the Council consider either reducing the monetary offset rate or abolishing it altogether.

Sincerely,

Rachel Dawson
Cascade Policy Institute



Columbia Riverkeeper
401 Portway Avenue, Suite 301
Hood River, OR 97031
phone 541.387.3030
www.columbiariverkeeper.org

June 25, 2020

Energy Facility Siting Council
Oregon Department of Energy
550 Capitol St. NE
Salem, OR 97301

Dear Members of the Oregon Energy Facility Council and Staff,

Please accept the attached petition signed by 380 Columbia Riverkeeper members who support the proposed carbon monetary offset rate change from \$1.90 to \$2.85. To ease your review, we have attached the list of signers to the same comment. All of the signers submitted the same form comment, included below. Several signers added their own short comment as well, which are included in the attached table.

Re: Strengthen CO2 Standard, Don't Hold Door Open for Fracked Gas Power Plants

Dear Members of the Oregon Energy Facility Siting Council and Staff,

I strongly support the staff's recommendation to strengthen Oregon's carbon dioxide standard. The proposed rules increase the Carbon Monetary Offset Rate in OAR 345-024-0580 from \$1.90 to \$2.85, a regulatory change which is consistent with the purpose of Oregon's carbon dioxide standard and Oregon Governor Brown's Executive Order No. 20-04, which states that "agencies shall exercise any and all authority and discretion vested in them by law to help facilitate Oregon's achievement of the GHG emission reduction goals set forth in...this Executive Order." EFSC staff demonstrate that the proposed rule is a reasonable way to bring Oregon's monetary offset cost closer to the actual, real-world cost of carbon offsets paid by the Climate Trust and others.

I further support EFSC's findings that the proposed rules and increase in the monetary offset rate are reasonable and fiscally achievable. Additionally, carbon reductions that may occur as a result from this rule will benefit society, and I support EFSC's staff's use of the Social Cost of Carbon in reaching this conclusion. The proposed rule takes an important step towards forcing new potential fracked gas power plants to recognize and internalize the costs of the carbon pollution they generate.

Sincerely, (See attached list of signers and their additional comments below)

First Name	Last Name	City	State	Zip Code	Comment
Paul	Caggiano	Portland	OR	97203-3141	
Christine	King	North Plains	OR	97133-8314	I support strong standards to fight carbon emissions.
David	Griffith	Portland	OR	97236-2000	
Ann	Watters	Salem	OR	97301-4352	No
Lucile	Brook	Nehalem	OR	97131-0136	
Ian	Shelley	Portland	OR	97225-6902	
Jill	James	Portland	OR	97220-4851	YES to increasing the Carbon Monetary Offset Rate.
Julianne	Ramaker	Bend	OR	97701-7947	
Elaine	Bettzig	Portland	OR	97206-8958	Everyone held accountable!!!
Alyssa	Deardorff	Molalla	OR	97038-9215	
Steve	Aydelott	Bend	OR	97701	
marilyn	mitton	Portland	OR	97209-3154	Oregonians want safe, clean energy---not fracked gas!!
Katherine	Wright	West Linn	OR	97068-1651	
Kelly	Larkin	Portland	OR	97223-7925	
					strongly support the staff's recommendation to strengthen Oregon's carbon dioxide standard. The proposed rules increase the Carbon Monetary Offset Rate in OAR 345-024-0580 from \$1.90 to \$2.85, a regulatory change which is consistent with the purpose of Oregon's carbon dioxide standard and Oregon Governor Brown's Executive Order No. 20-04, which states that "agencies shall exercise any and all authority and discretion vested in them by law to help facilitate Oregon's achievement of the GHG emission reduction goals set forth in...this Executive Order."
Jeri	Jenkins	Portland	OR	97211-3955	
Susan	Wechsler	Corvallis	OR	97330-9207	

					We need your proactive action to minimize the broad and deep health and climate risks of high carbon emission facilities. It is vital to our communities' health and to our future. I applaud you for the proposed rule and urge you to move forward,
Sarah	Prowell	Portland	OR	97239-2154	unimpeded,...for our future.
Karen	Black	Williams	OR	97544-0352	
					COMPLETELY BAN FRACKING. It undermines the very
Nina	French	Portland	OR	97220	ground we stand and build on.
Eugene	Zilberstein	Portland	OR	97202-2716	
Alicia	Liang	Portland	OR	97214-5701	
					Thank you for supporting a sustainable future in Oregon. This cost increase will encourage healthier
Amanda	Weber-Welch	Portland	OR	97214-4721	environmental actions.
Dena	Turner	Portland	OR	97215-2805	
Randall	Webb	Portland	OR	97210-3490	
					Take this action. Anything less is a crime against our
Steven	Bruckner	Portland	OR	97210-3770	children and grandchildren.
Nancy	Loeb	Portland	OR	97205-5814	
Jillian	Murphy	Portland	OR	97214	
Ken	Humke	Portland	OR	97215-2912	
Marjorie	Nafziger	Portland	OR	97202	
Penelope	Lichatowich	Lake Oswego	OR	97034-5173	
Dan	Sherwood	Portland	OR	97214-5038	
Georgeanne	Samuelson	Oakridge	OR	97463	
Alan	Scott	Portland	OR	97202-3003	
Jean	Svadlenka	Wilsonville	OR	97070-8761	
April	Atwood	Portland	OR	97202-5442	
					We NEED safe, clean energy--NOT fracked gas! Please
					do what is right for our environment and for our
Jessica	Kelley	Portland	OR	97227-1026	citizens.

hillary	bryan	Portland	OR	97214-4334	
Kristin	Siess	Portland	OR	97232-3249	
					It's time to invest in renewables and stop brutalizing
Deborah	Brown	Portland	OR	97215-3830	the earth for another drop of oil!
Marita	Ingalsbe	Portland	OR	97221-3346	
Debbie	Rehn	Portland	OR	97202-4557	
Jessica	Rojas	Portland	OR	97211-3939	
Anne	Smith	Portland	OR	97239-2025	
Lee	Chapman	Bend	OR	97702-1511	
Kim	Davis	Salem	OR	97306-8802	
					Absolutely no fracked gas. Do not contribute to the
					harm to the earth and humanity. We are stewards of
Tamara	Westbrook	West Linn	OR	97068-4831	this earth, own this responsibility.
Amy	Roberts	Albany	OR	97321-9637	
Satya	Vayu	Portland	OR	97215-1618	
					We must facilitate the transition away from fossil
					fuels. Monetary incentives seem to me to be the most
Roger	Kofler	Portland	OR	97267-6365	effective way to do that.
Paul	Borcherding	La Grande	OR	97850-0543	
					Absolutely NO fracking. Not now, NOT EVER. We must
					protect our already over polluted planet. We have
					many sustainable options now. Fracking is not the
Summer	Oja	Astoria	OR	97103-4034	answer.
Teresa	Barnes	Astoria	OR	97103-4630	
Linda	Alstad	Salem	OR	97304-4213	
Sandy	Polishuk	Portland	OR	97212-4464	
					I strongly support any effort to strengthen Oregon's
Robert	Olds	Portland	OR	97213-4514	carbon dioxide standard.
Dawn	Dille	Portland	OR	97233-5703	
Nancy	Hline	Portland	OR	97211-8141	
Don	Stephens	Portland	OR	97202-5019	

Alodie	Spires	Portland	OR	97206-5354
James	Milling	Hood River	OR	97031
Robert	Carothers	Lake Oswego	OR	97035-4551
Gloria	Fisher	Portland	OR	97220-5948
William	Obrien	Beaverton	OR	97005-1360
Anne	Anderson	Ashland	OR	97520
Janice	Karpenick	Portland	OR	97229-6383

I cannot believe we even allow fracking in Oregon! If it pollutes, we should ban it! Fining them? If it were allowed at all, we should make them pay for a full-time on-site state inspector, and shut them down until any pollution is cleaned up, every time it

Michael	Wilson	Portland	OR	97214-2651
Anne	Ryland	Ashland	OR	97520-3236
Jamie	Shields	Portland	OR	97229-8985
Michael	Johnson	Portland	OR	97209-2724
Don	Jacobson	Portland	OR	97201-6304

The only question you really need to answer is this: what did you do when you knew? If 50% is all you can do, do it, if you can do more, do more.

rick	rappaport	Portland	OR	97212-1527
Lorraine	Foster	Portland	OR	97202-6533
Craig	Skinner	Portland	OR	97218-3936

I lived close to fracking activity east of Loveland/Ft Collins area in Colorado for 10 years. Heavy pollution has taken up position all along the front range down to south of Denver. No one is doing enough to see to it that each well head is properly monitored for escaping methane and other toxic chemicals. With Denver and all front range cities and towns scoring an F with American Lung Association it was no wonder I developed lung problems and 4 years ago move the the NW area of Oregon.

David	Broccoli	Salem	OR	98302
Kathleen	Mitchell	Portland	OR	97215-2667
Kathryn	Robinson	Gladstone	OR	97027-2252
Jean	Rosenbalm	8024 SW 158	OR	97007
John	McSwigan	Hillsboro	OR	97124-5044
Chuck	Gehling	Hood River	OR	97031-8666

Fracking is a dead end game. Although natural gas is comparably cheap to use now, in the long run the environmental degradation created by fracking will make it unbearably expensive for future generations of both people and wildlife. Think and act now for a better tomorrow for your children and grandchildren.

Jef	Gunn	Portland	OR	97216-2509
Arthur	Noble	Bandon	OR	97511
Howard	Wade	Portland	OR	97267-3523
Letitia	Tarver	Astoria	OR	97103-5571
Lise	Hull	Bandon	OR	97411-9651

Jef Gunn
All politicians should be on board for clean air and water if not vote them out.

\$2.85 is a ridiculously low price! Please keep increasing this charge at the maximum rate allowed by statute.

Gregory	Monahan	Portland	OR	97219-2015
Julia	Allen	Portland	OR	97214-5706

					It is essential to raise the price per ton of CO2 pollution as per the staff recommendation. The fact that the price has been so low in the past is an historic mistake based on a century of allowing polluters to foul the commons for free. It is way past time to institute the price hike, and is consistent with current OR plans to move away from a fossil-fuel free-for-all economy.
Bonnie	New	Hood River	OR	97031-7752	
Tom	Bugas	Portland	OR	97232-3239	
Teetle	Clawson	Portland	OR	97211-8217	
A.	Todd	Eugene	OR	97404-0509	
Robert	Bresky	Oregon City	OR	97045-7221	
Jill	Wyatt	Baker City	OR	97814-1626	As a person with allergies and sensitive of chemicals, I support the staff's recommendation to strengthen Oregon's carbon dioxide standard.
Diane	Luck	Portland	OR	97212-2524	We need to move toward SUSTAINABLE ENERGY!
James	Knoll	Portland	OR	97210-2625	Please don't encourage fracking and pollution producing energy.
Brandon	Trelstad	Corvallis	OR	97330	We have unprecedented opportunities to protect the lives of future generations. Please take every possible step to put a cost on carbon the reflects the true cost to our society, and the future. It is not fair that future Oregonians will need to fight hard to just survive because of the greed of today's and yesterday's generations. Thanks.
dana	Bleckinger	Yachats	OR	97498-0904	
Nancy	Cushwa	Portland	OR	97217-6251	
Ron	Ennis	Portland	OR	97213-1247	Equal rights for all
Philip	Colvard	Medford	OR	97501-2535	
Paulette	Meyer	Portland	OR	97215-3414	

Marilyn	Veomett	Portland	OR	97202-7834
Anne	Clark	Mosier	OR	97214
Phyllis	Oster	Portland	OR	97205

Phasing out the fossil fuels is our most urgent need beside fighting the corona pandemic. Climate change and pandemics are our greatest challenges.

Gisela	Ray	Portland	OR	97216-3182
Jane	Farrell	Eugene	OR	97405-1795
Mark	McCormick	Hood River	OR	97031-1815
Helen	Anderson	Gladstone	OR	97027-2108
Sarah	Stevenson	Portland	OR	97212-5401
George	Pantely	Mount Hood	OR	97041
Olivia	Bass	Portland	OR	97221-1906

It makes a big difference how natural gas is produced. Nothing natural about fracking!! Money speaks: let big fracking polluters pay the pollution costs. I support the carbon Monetary Offset Rate increase, and you should too. Thank you

Catherine	Arp	Portland	OR	97212-3866
Yvonne	Wright	Warrenton	OR	97146-9425

I want CLEAN air and water and I'm damned tired of begging for them.

Kelly	McConnell	Portland	OR	97223-3950
Corinne	Sherton	Salem	OR	97306-1007

Thank You for taking this step. Please continue to work toward carbon reduction in our Oregon.

Nancy	Cable	Lincoln City	OR	97367-9655
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Nancy Cable

I completely agree with raising the offset rate and thank the EFSC for so doing.

Brett	Baylor	Portland	OR	97202-6326
Erik	Kaiei	Portland	OR	97217
Melody	Shapiro	Hood River	OR	97031-9723
Patty	Larsen	Astoria	OR	97103-6436
casey	cunningham	Portland	OR	97211-3523
Jeffrey	Wallace	Hood River	OR	97031-9753

Carol	Blenning	Portland	OR	97213-3737	
Maureen	Lauran	Hood River	OR	97031-2152	
					Thank you for supporting the health of people and the
P	Horter	Portland	OR	97231-1350	environment.
Michael	Halloran	Salem	OR	97305-2161	
					We MUST wean ourselves off of fossil fuels and move
					to wind, solar and hydro electric...CLEAN ENERGY
					sources!
Claudia	Gray	Drain	OR	97435-0668	
Carolina	Hood	Eugene	OR	97402-3730	
Aaron	Gardner	Portland	OR	97203-2910	
Rebecca	Kimsey	Sublimity	OR	97385-9682	
Valerie	Blackmore	Columbia Cit	OR	97018-0453	
Judy	McLean	Portland	OR	97212-2856	
Kathy	Smith	Grants Pass	OR	97527-9430	
Howard	Shapiro	Portland	OR	97201-6304	They should be paying more.
Cheryl	Erb	Salem	OR	97301-2547	
Katy	Eymann	Bandon	OR	97411-9534	
Wanda	Graff	Canby	OR	97013-9725	
					We are in a climate crisis. We must do all that we
Melissa	Hathaway	Portland	OR	97230-5778	can.
marna	herrington	Portland	OR	97210-5580	
Deborah	Honthaner	Portland	OR	97219-3670	
Sandra	Joos	Portland	OR	97239-7202	
Sam	Wardwell	Portland	OR	97267-4524	
catherine	keys	Medford	OR	97501-9070	
Michael	Snouffer	Medford	OR	97504-4420	
					Fracking causes earthquakes (see Oklahoma) and the
					process injects 500 chemicals into our water. Please
					ban fracking forever in Oregon; it's bad for the
gail	ohara	Portland	OR	97213-1182	environment, for humans and wildlife.

					It's time to wean ourselves off fossil fuels and 100 percent turn to renewable energy sources!
stephen	couche	Portland	OR	97202-3662	
Carolyn	Eckel	Portland	OR	97230-7152	
D	Stirpe	Portland	OR	97214-1633	
Kathy	Garrett	North Bend	OR	97459	
Rick	Ray	Troutdale	OR	97060-9380	
Melanie	Plaut	Portland	OR	97212-1760	
Alice	Shapiro	Portland	OR	97201-6304	
					Continue to hold powerful corporations accountable and protect the environment in which we live. Mary Lou Emerson
Mary Lou	Emerson	Portland	OR	97202-6328	
Laurie	Fisher	Portland	OR	97224-4339	
Jeffrey	White	Forest Grove	OR	97116-8523	
donna	roddvik	Hood River	OR	97031-1142	
Heather	Chapin	Portland	OR	97217-5454	
Anna	Cowen	Portland	OR	97266-2532	
Rolando	Rodriguez	Port Orford	OR	97465	
Gina	Norman	Portland	OR	97213-5826	
jeff	kipilman	Portland	OR	97212-1913	
Susan	Donohoe	Portland	OR	97205-5809	
Jenifer	Schramm	Portland	OR	97210-2355	
Janet	Elgin	Portland	OR	97232-3574	
Randall	Nerwick	Portland	OR	97222-5540	
Angela	Ashburn	Portland	OR	97239-1909	
Lynnea	Eagle	Portland	OR	97219-1957	
Ryan	Schwartz	Portland	OR	97213-5410	
Dana	Weintraub	Beaverton	OR	97003-4249	Don't you think its time to take progressive action?!
Joel	Porter	Portland	OR	97293-0515	
Phoenix	Oaks	Portland	OR	97217-2360	
Au	Nguyen	Portland	OR	97214-5708	

Dianne Phil	Ensign Harris	Portland Portland	OR OR	97219-7655 97206-1517	Protecting the environment is my highest priority. Our future is at stake if we don't move away from fossil fuels.
Hank	Keeton	Scotts Mills	OR	97375-9637	We need to swiftly phase-out all fossil-fuel production and use. There are many substitutes, but we have very little time left to save ourselves from our oil-addiction.
Michele Jere	Penner Rosemeyer	Bend Eugene	OR OR	97701-9651 97402-1600	I strongly support strengthening the CO2 standard. Keep Oregon clean!
Claudia	Sanzone	Portland	OR	97229-8565	
Robert	Plata	Salem	OR	97303-9610	
Kima	Garrison	Portland	OR	97211-6341	
Hyung	Nam	Portland	OR	97214-2767	
William	Barnett	Astoria	OR	97103-4618	Climate warming is getting worse faster than most estimates had figured. 'Positive' feedback loops in melting permafrost are just starting to kick in, with the potential of yet higher rates of increase of atmospheric methane. We simply do not have time for minuscule advances to counteract these powerful forces, that will probably render large areas of Earth uninhabitable in the very near future. It's (past) time to put everything we have towards heading off this irreversible catastrophe. If we are going to do something, we need to get started NOW. Maximum carbon accountability is the least we should be doing.
Matthew	Anderson	Portland	OR	97202-6754	Remove the dams on the Snake and Columbia Rivers while you are at it.
Richard	Jaffe	Portland	OR	97229-2599	I agree with this message!
Bryan	Friel	Portland	OR	97210-2567	Stop polluting this country!

					We need to take steps now to avoid a disastrous future for our children. Never mind the monetary debt.
Mary	Bycroft	Portland	OR	97213-6314	
Matthew	Barmann	Hood River	OR	97031-1211	
Marilee	Corey	Salem	OR	97302-9795	
Susan	Vosburg	Gales Creek	OR	97117-9419	
Nancy	Carl	Carlton	OR	97111-9606	
Kyle	Rolnick	Lorane	OR	97451-0999	
Jana	Castañares	Mount Hood	OR	97041-0143	
					Please do whatever you can to keep fracking out of Oregon entirely!
Judy	Ronis	Astoria	OR	97103-4719	
					Now is not the time to be taking steps to continue to endanger this planet!
Laura	Alexander	Portland	OR	97212	
Kayleigh	O'Hara	Portland	OR	97212-1463	
melissa	rehder	Portland	OR	97206-9067	
Elizabeth	Waldron	Corvallis	OR	97330-3134	Oregon doesn't need any fracked gas!
					Do the right thing to protect the public, not the profits of the oil and gas companies.
David	Michalek	Hood River	OR	97031-2215	
Annie	McCuen	Salem	OR	97302-5209	Thank you fo4 this decision
Tracy	Eberwein	Coos Bay	OR	97420-4411	
Todd	Henion	Portland	OR	97213-3936	
Phil	Goldsmith	Portland	OR	97210-2986	
Christine	Ashmore	Portland	OR	97213	
clifford	myers	Deer Island	OR	97054-9528	
Susanna	Askins	Portland	OR	97239-3855	
					Global warming is putting us all at risk. Anything that contributes to global warming needs to be reduced and eventually eliminated.
Diana	Pope	Portland	OR	97212-5345	
Francisco	Gadea	Portland	OR	97212-2356	
Karen	Stolzberg	Portland	OR	97219-5326	
Steve	Sheehy	Klamath Falls	OR	97603-8303	

Barbara	Rippey	Manzanita	OR	97130-0026	
David	Nez	Portland	OR	97203-6081	No more fracked gas!
John	Weil	Portland	OR	97225-7600	
Rebecca	Picton	Corvallis	OR	97330-1919	
Kirsten	Oliver	Eugene	OR	97401	
Inge	Hindel	Portland	OR	97232-2450	
Kirk	Leonard	Salem	OR	97309-1878	
Harlan	Shober	Portland	OR	97214-5700	
Michael	Brown	Eugene	OR	97405-1121	
William	Heerd	Portland	OR	97267	
Joan	Meyerhoff	Portland	OR	97211-8239	
Fracking, in itself, is detrimental to our environment					
Gail	Sanford	Portland	OR	97267-3141	including our waterways.
Mary Lou	Soscia	Portland	OR	97213-3518	
Robin	Weage	Portland	OR	97229-3427	We need clean energy not fracking!
Peter	Brown	Portland	OR	97203-3110	
Ellen	Bailey	Portland	OR	97214-1175	
Diana	Saxon	Salem	OR	97301-1918	
As a former employee of San Diego Air Pollution Control District I have seen first hand how emissions standards work. Programs such as 'Bankable Emissions' have garnered much success in populated areas like Southern California for instance. Steps taken to reduce the carbon footprint are essential to					
Marcella	Laudani	Bay City	OR	97107	Oregon's future. Let's get started!
Janice	Vranka	Portland	OR	97219-5505	
Kathy	Birch	Portland	OR	97214-5023	
monica	Gilman	Estacada	OR	97023-9417	
We need to make decisions and take actions TODAY that will make the earth more habitable for our					
Jean	Culp	Bandon	OR	97411-6362	children and grandchildren.

In the face of the climate change emergency, we must do everything we can to reduce carbon emissions in every way as rapidly as possible. Fracked gas damages the climate & environment in at least six ways: during extraction it is linked to local earthquakes, & a toxic mix of chemicals (including known carcinogens like benzene) is injected into target geological formations, endangering aquifers and other underwater sources; raw fracked sludge can leak during transport, and the pipelines disrupt & endanger wild lands, riparian areas & rivers, tribal & sacred sites, & other private property; refinement & transport of the refined gas are major sources for leaks of methane, the most powerful greenhouse gas known; and of course the burning of the refined gas releases CO2 and other greenhouse gases. All this is entirely unnecessary: clean energy alternatives to fossil fuels are widely available now.

Jane	Kwiatkowski	Eugene	OR	97405-3520
Carrie	McCoy	Portland	OR	97211-2548

The Platform from the Poor People's Campaign: A National Call for Moral Revival led by Dr. William Barber states: The truth is that our policies have not fundamentally valued human life or the ecological systems in which we live. Instead it has prioritized private, corporate and financial interests over our precious natural resources.

Jean	Eilers	Portland	OR	97213-1555
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I am surprised that fracking is allowed in Oregon at all.

Joyce	Sherman	Portland	OR	97230-5120
Jean	Wynn	Portland	OR	97222-4485
Laura	Hanks	Portland	OR	97222-2325
Tora	Bengochea	Grants Pass	OR	97527-9721

Cathie	Bell	Portland	OR	97218-2407
Natalie	Ranker	North Bend	OR	97459-3659

Minimizing carbon is a first step in a path toward clean air. Natural gas is a potent pollutant by itself, and is prone to escaping during storage and transportation. We have safer, cleaner energy options that are less harmful to public health. We must continue to move away from fossil fuels. We must stop allowing polluters to dump the consequences of their industry onto the shoulders of the public.

Brian	Garrison	Portland	OR	97215
Sheila	Richmond	Hood River	OR	97031-8820

Let's ensure the burden of costs associated with these operations are covered by raising rates.

Tom	Hartland	Astoria	OR	97103
Pamela	Vasquez	Salem	OR	97305-3062
Ivon	Moreno	Portland	OR	97211
Maryann	Rudy	Portland	OR	97209-1249
Mary	McGaughey	Gresham	OR	97030-1142
Chiquita	Rollins	Portland	OR	97211-4956
Katherine	McKinsey	Portland	OR	97217-5146
Victoria	Holzendorf	Lake Oswego	OR	97034-4118
Elizabeth	Jacob	Portland	OR	97219-2147
Benton	Elliott	Eugene	OR	97401-3986
Steven	Schafer	Portland	OR	97225-5808

Please move forward with strengthening Oregon's CO2 standards.

Gretchan	Jackson	Portland	OR	97215-3637
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					I want to thank the Governor for the AMAZING Job she has done handling this COVID emergency. She showed brains and courage and a commitment to the people not to profits and I'm proud to have voted for Our Kate. I'm sure she and her administration will continue to put the people of Oregon first and I want to thank them from the bottom of my Webfoot Heart for that.
Jean	Wyman	Portland	OR	97213-5766	We need to invest this extra cash in renewable
Angela	Zehava	Portland	OR	97202-6631	energy.
John	Barger	Portland	OR	97206-8418	All flourishing is mutual on this earth. When we humans--the only species with agency--ignore the intricate connections of all to each, we act to target instead of protect life. Think hard about what your ethic is.
Linore	Blackstone	Portland	OR	97213-2025	
Lynn	Miller	Portland	OR	97202-5467	Actually, a higher rate would work even better for the environment!
Lucy	Schneid	Portland	OR	97213-1914	
Lawrence	Hansen	Portland	OR	97280-0509	
Per	Fagereng	Portland	OR	97202-3934	
Patricia	Schafer	Portland	OR	97219-1439	
DREW	BRADBURY	Portland	OR	97221-2831	
Diana	Boom	Lake Oswego	OR	97034-3043	
Dennis	Smith	Enterprise	OR	97828-1249	I firmly believe that we should all be paying the REAL costs of pollution, and that certainly includes those who are profiting by it. Thank you.
Susan	Mates	Portland	OR	97229-6631	

					The use of fracked gas is anathema to a clean environment. It is another means to avoiding a genuine commitment to clean energy and energy conservation. The least you can do is strengthen Oregon's carbon dioxide standard.
Greg	Jacob	Hillsboro	OR	97124-4096	
Don	Abing	Astoria	OR	97103-2416	
Cheryl	Bruner	Williams	OR	97544	I do not want fracked gas to enter oregon
					Fracking has an extremely high environmental cost. It is absolutely appropriate to raise the carbon offset cost to reflect the damage it does. Keep up the good work.
Stephen	Bachhuber	Portland	OR	97202-2717	Please stop all future investment in fracking and move our state into cleaner and safer energy solutions right now. thank you!
Steve	Hocker	Portland	OR	97224-1265	
Kenneth	Deveney	Ashland	OR	97520-2833	
John	Reynolds	Portland	OR	97222-7938	
Laurie	Dougherty	Salem	OR	97301-9695	
Anne-Marie	Summerhays	Portland	OR	97206-3244	
					Make up your mind as to whom are your real constituents.
Marcel	Liberge	Murphy	OR	97533-0277	
David	Ellenberger	Portland	OR	97211-2005	
Ninette	Jones	Portland	OR	97217	
Lois	White	Grants Pass	OR	97527-5584	
Sharon	Burge	Salem	OR	97306-2011	
Maureen	O'Neal	Portland	OR	97223-8981	
Rhett	Lawrence	Portland	OR	97217-2024	
Melissa	Owens	Portland	OR	97229-8084	
Drew	Miles	Portland	OR	97213-6951	
Larry	Morningstar	Talent	OR	97540-7005	
Cindy	Allen	Hood River	OR	97031-8725	
Joseph	Breazeale	Ashland	OR	97520-1662	

Jamie	Melton	Portland	OR	97217-4053
David	Nichols	Portland	OR	97213-3021

It is good to know that you are considering raising the bar on environmental degradation. Oregon has led before in demonstrating that a government can do what is good for the citizenry, I reference the open beaches, the protected forests, and the bottle bill. Go for the most you can do.

Rachel	Ulrich	Astoria	OR	97103-2537
Mary	Buckley	Portland	OR	97211-7235
Brent	Rocks	Portland	OR	97201-6132
John	Schumann	Portland	OR	97212-2708
Christina	Mackin	Portland	OR	97214-4141
Jan	Polychronis	The Dalles	OR	97058-0639

Thank you for your continued stand to protect the quality of life in our beautiful state. Your work is critical to a healthy and prosperous future.

Patricia	Browning	Ashland	OR	97520-1389
Ann	Turner	Portland	OR	97211-5770

Fracking is not worth the damage it does to both environmental health and human health!

Joan	Walsh	Hood River	OR	97031-7796
Nora	Polk	Portland	OR	97206-6605
Paul	Halliday	The Dalles	OR	97058-5410
Alex	Brown	Portland	OR	97202-1874
Margaret	Halloran	McMinnville	OR	97128-8564
Cynthia	Enlow	Albany	OR	97321-1176
Craig	Mackie	Nehalem	OR	97131-9665
Kelly	O'Hanley	Portland	OR	97213-4056
Mike	Brinkley	Eugene	OR	97405-1456
Cale	Christi	Chiloquin	OR	97624-9711
Rory	Cowal	Portland	OR	97213-3822
Juan	Calvillo	Portland	OR	97267-1571
Karlyn	Gedrose	Prescott	OR	97048

This is the end game for fossil fuels, and it can't end soon enough. There is nothing between ourselves and a renewable future other than policy inertia. The problem is not technical, we have everything we need to transition including a large number of eager entrepreneurs. The problem is the economic desires of entrenched interests. They can easily learn to live within these requirements. I support the staff's proposal and their findings. This is a big step in a different direction, one that's been long overdue.

Norm	Cimon	La Grande	OR	97850-1393
Jay	Humphrey	Estacada	OR	97023-9417
Dustin	Kearns	Portland	OR	97202-5224
Michael	Burmester	Happy Valley	OR	97086-6074
Beth	Levin	Portland	OR	97223-2415
Barbara	Krupnik-Gold	Portland	OR	97216-3501

Fracked gas is just that a dangerous polluting fossil fuel that is ruining communities and endangering our planet. It is time to stop dithering and take action to protect our children and grandchildren. Any move that will restrict this fuel will benefit all of us.

Ruth	Dallas	Gaston	OR	97119-9150
Pamela	Larsen	Mosier	OR	97040-9722
Craig	Heverly	Portland	OR	97202-3757
Vincent	Alvarez	Portland	OR	97222-6036
Mary	Warren	Portland	OR	97201-5040
Judith	Lienhard	Portland	OR	97225-2567
Dave	Potts	Cornelius	OR	97113-1035
Kathleen	Boylan	Portland	OR	97206-6464
David	Edwards	Eugene	OR	97404-1292
Mary	Peterson	Newport	OR	97365-9605

Lets end this Hydrocarbon thing!
Carbon reduction is a benefit to society
This expresses my feelings exactly!
Save the earth, save ourselves.

					Oregon has always been a leader in protecting our environment and setting an example for the entire nation to follow. I support this courageous ruling to hold the fracking industry accountable for their environmental pollution. Respectfully yours, Anne-
Anne-Marie	Claire	Portland	OR	97212-5249	Marie Claire
Dan	Jaffee	Portland	OR	97211-5011	
Jewel	Hall	Eugene	OR	97405-4822	
Francoise	Renaud	Portland	OR	97213-2627	
carolyn	williams	Portland	OR	97230-1521	
					YES! THIS IS A SMALL STEP COMPARED TO WHAT IS NEEDED TO INSURE A CATASTROPHE IS AVOIDED FOR ALL OF US, ESPECIALLY ALL THE CREATED BEINGS ON THE EARTH AND THE GENERATIONS AFTER US BABY BOOMERS. ED
Ed	Kaie	Portland	OR	97217-2022	
Joan	Viers	Hubbard	OR	97032-9200	
					I strongly support your taking this important action to protect present and future Oregonians from the terrible pollution caused by gas fracking. Thank you for your service.
Darlene	Carlson	Portland	OR	97202-2237	
John	Nettleton	Portland	OR	97202-3265	
					Oregonians do not want or need fracked gas! We have been fighting Jordan Cove for over ten years. Please protect our environment from careless polluters like the fracking industry.
Jenet	Johnsen	Ashland	OR	97520-9468	
					Fracked gas is extremely harmful to our communities and our shared atmosphere, often impacting low income folks the most. Please hold the companies accountable and ban fracking in Oregon.
Katelyn	Entzeroth	Portland	OR	97227-1383	
Ron	Berti	Portland	OR	97225-6454	
Sandi	Cornez	Portland	OR	97219-5208	

Linda	Bolduan	Lake Oswego	OR	97034-6447	
Corinne	Fargo	Portland	OR	97202	
David	Hermanns	Portland	OR	97203-2457	
Claire	Cohen	Lake Oswego	OR	97034-3201	
Diane	Craig	Beaverton	OR	97008-6893	
Rae	Coleman	Vancouver	WA	98661-4103	
Lori	Kunkel	Portland	OR	97203-5021	
Paula	Duncan	Astoria	OR	97103	
Susan	Heath	Albany	OR	97322-8898	
Dean	Sigler	Beaverton	OR	97003-2907	Reduced medical bills alone could offset any additional costs. It simply makes sense that polluters should pay and not leave the rest of us to suffer the consequences of their economic activity.
Ann	Littlewood	Portland	OR	97212-3445	
Becky	Orf	Ashland	OR	97520-2826	
Meighan	Walsh	Portland	OR	97209	
Darleene	Meyer	Portland	OR	97229-4407	
Joan	Walker	Bishop	CA	93514	
kent	Sugnet	Portland	OR	97215-3527	While we all thought that so-called 'natural gas' would be a good transition pathway for the climate crisis, it has turned out not to be and this action is desperately needed.
Capt. Peter	Wilcox	Portland	OR	97211-1074	
Lark	Lennox	The Dalles	OR	97058-2648	
Cristy	Murray	Oregon City	OR	97045-8705	Even better, let's pass laws so that fracking will not occur in Oregon. It pollutes and wastes water when we have been in a drought year. Water is life. Fracking is death to the planet and all of us. Oregon is known for its natural settings and recreational opportunities. Fracking is death to both.
Susan	Haywood	Portland	OR	97210-3526	

Franklin	Colbert	Portland	OR	97229-7128	
Sharon	Holford	Portland	OR	97222-8152	
Charles	Townsend	Portland	OR	97212-3162	
Julianne	Martinson	Everett	WA	98201-1114	
Cynthia	Marrs	Junction City	OR	97448-9345	
Judy	Kinsman	Florence	OR	97439-9606	Stop the destruction of our precious environment!!!!
Karen	Trumper	Portland	OR	97229-4817	
William G	Gonzalez	Suffern	NY	10901-4289	
James	Ramirez	Corvallis	OR	97330-6070	
Gabriela	Jorge	Hood River	OR	97031-8765	
Rebecca	Clark	Portland	OR	97203-4418	
Adonai	Booth	Portland	OR	97211-4151	
Mary	Davis	Portland	OR	97206-7856	
Courtney	Baggett	Portland	OR	97213-2927	
Robert	Bernstein	Portland	OR	97215-2953	I want nothing less than full accountability.. Please know how strongly I support the above proposal, YES! for the sake of everyone, and for the sake of the natural world. Asking carbon polluters to begin to reckon with their destruction to our world and to vulnerable communities is an important step towards a better future for all. Thank you for holding this industry accountable.
Amanda	Moore	Portland	OR	97217-1556	
Lynn	Baker	Beaverton	OR	97003-3739	
Diana	Talcott	Portland	OR	97202-2208	please help to keep Oregon free of gas fracking. we've read about PA and other states and the horrors entailed there. Thanks for keeping Oregon pristine and habitable. Hugh Cochran
Hugh	Cochran	Eugene	OR	97404-1944	
Joann	Macey	Portland	OR	97224-3381	

We are giving our PLANET A FEVER! We have to start
changing our ENERGY USEAGE NOW! We need to do
it to SAVE OUR GRANDCHILDREN ! Don't give PSYCHO

Christopher Warren Springfield OR

97478-9575 BILLIONAIRES MORE MONEY FOR KILLING US!



June 25, 2020

EFSC Rules Coordinator
Oregon Department of Energy
550 Capitol St. NE
Salem, OR 97301

Submitted to: EFSC.rulemaking@oregon.gov

Re: Carbon Monetary Offset Rate Update
Comments of the Multnomah County Office of Sustainability

Dear Oregon Energy Facility Siting Council:

The Multnomah County Office of Sustainability (MCOS) appreciates efforts by the Oregon Energy Facility Siting Council (EFSC) to initiate this rulemaking to increase the Carbon Monetary Offset Rate in OAR 345-024-0580 from \$1.90 to \$2.85 per ton of carbon dioxide. We strongly support the proposed increase and consider it appropriate and necessary to make EFSC's Carbon Standard more effective and to advance Oregon's goal of reducing greenhouse gas emissions.

Facilities that must reduce their carbon dioxide emissions to meet the applicable carbon dioxide emissions standard may do so by providing funds "in an amount deemed sufficient to produce the reduction in greenhouse gas emissions necessary to meet the applicable carbon dioxide emissions standard."¹ While the current monetary offset rate per ton of carbon dioxide is only \$1.90, the "average negotiated price of offsets negotiated by [The Climate Trust] as of December 31, 2019 was \$6.00 per ton of CO₂e."² As a result, the current rate is not sufficient to produce the reduction in greenhouse gas emissions necessary to meet the applicable carbon dioxide emissions standard.

¹ ORS 469.503(2)(c)(C)

² EFSC Staff Report for Agenda Item D (Action Item) 2020 Carbon Offset Rate Update (R203) at 3 (Apr. 10, 2020).

The proposed increase in the carbon offset rate is a step in the right direction. The proposed increased rate of \$2.85 per ton of carbon dioxide remains well below the average offset price per ton of carbon dioxide negotiated by the Climate Trust as well as the rate in the global voluntary market.³ However, EFSC can only update the rate by up to 50 percent in a two-year period.⁴ We strongly support and appreciate EFSC's efforts to increase the carbon offset rate by the full 50 percent, and encourage future increases to bring the rate to a level that is closer to the average price of offsets and that therefore can produce the reduction in greenhouse gas emissions necessary to meet the applicable carbon dioxide emissions standard.

The proposed increase in the carbon offset rate is also consistent with the direction in Executive Order No. 20-04 that agencies "exercise any and all authority and discretion vested in them by law to help facilitate Oregon's achievement of the GHG emission reduction goals set forth in . . . th[e] Executive Order."⁵ As the Oregon Department of Energy highlights in its Executive Order 20-04 Implementation Report, the updated offset rate will "result in a greater proportion of the excess carbon dioxide emissions of (facilities) being offset."⁶ Hence, we expect that the updated rate would help facilitate Oregon's achievement of the GHG emission reduction goals in Executive Order 20-04.

We are grateful to EFSC and EFSC Staff for the work that went into initiating this rulemaking and accelerating its timeline. We encourage EFSC to approve the increase of the carbon offset rate from \$1.90 to \$2.85 per ton of carbon dioxide and therefore strengthen the effectiveness of its Carbon Standard while advancing Oregon's goal of reducing greenhouse gas emissions.

Sincerely,

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³ *Id.*

⁴ ORS 469.503(2)(c)(C)

⁵ Executive Order 20-04 at 5.

⁶ Oregon Department of Energy. May 2020. Executive Order 20-04 Implementation Report at 11 (available <https://www.oregon.gov/energy/energy-oregon/Documents/2020-05-15-EO2004-Implementation-Report.pdf>)