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December 17, 2019

Kathleen George, Chair  
Oregon Environmental Quality Commission  
Department of Environmental Quality  
700 NE Multnomah Street, Suite 600  
Portland, OR 97232-4100

Re: Indirect Source Rules for Construction and Operation

Dear Chair George:

As a Metropolitan Planning Organization (MPO), Metro has over a two-decade history collaborating with the Oregon Department of Environmental Quality (DEQ) on the implementation of air pollution and greenhouse gas reduction strategies. Metro is interested in the concept of addressing air quality impacts through indirect source permitting and believes now is an appropriate time to have this conversation.

While our region's formal federal obligations pertaining to reducing transportation emissions were successfully completed in 2017, Metro remains aware much more needs to be done to achieve our region's air quality and climate goals. For example, Metro is joining other jurisdictional partners to adopt clean diesel construction standards to reduce diesel emissions and pollution hotspots resulting from construction. In addition, Metro continues to partner with DEQ on implementing the Employee Commute Options Program through Metro's Regional Travel Options program. On the horizon, Metro is aware DEQ will apply to participate in the U.S. Environmental Protection Agency's Ozone Advance program to develop and implement proactive strategies to address recent violations of the ozone standards. Metro stands ready to assist in this effort.

We look forward to the discussion around air quality impacts through indirect source permitting and will serve in whatever capacity is helpful to find workable solutions to these very real concerns. Thank you for your leadership.

Sincerely,