

10/27/10



Oregon

Theodore R. Kulongoski, Governor

Department of Environmental Quality

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October 19, 2010

Shawn P. Wood
Construction Waste Specialist
City of Portland Bureau of Planning and Sustainability
1900 SW 4th Avenue, Suite 7100
Portland, OR 97201

Dear Mr. Wood:

I am pleased to submit this letter of support for the City of Portland's "Proposed Amendment to Oregon Reach Code- Material Resource Conservation and Efficiency". ORS 459.015(2) establishes the following waste management hierarchy for solid waste: first, prevent waste from occurring; then reuse; recycle; compost; burn for energy recovery; and lastly, landfill waste generated. The City of Portland has appropriately connected the energy conservation benefits of reuse and recycling with the main goals of the Reach Code – to conserve energy. Furthermore, ORS 459.015(1)(f) states that, "It is in the best interests of the people of Oregon to conserve resources and energy by developing an economy that encourages waste prevention and recycling."

The State's existing materials recovery system already provides significant energy savings. This proposal, in the spirit of the Reach Code, will conserve more energy and reduce material-related environmental emissions for those municipalities that choose to adopt this proposed appendix. Additionally, DEQ supports including this amendment as an optional appendix to the Reach Code, which would allow for maximum flexibility at the local level.

Recent research by Oregon DEQ indicates that about 25% of the lifecycle energy consumed by a residential home is in producing and transporting the building materials and the other 75% is consumed through operating the home. While this fact certainly reinforces the Reach Code committee's focus on increasing operational efficiency, it also sheds light on the increasing role the embodied energy of materials will play as our buildings become more efficient. DEQ supports the City of Portland's holistic approach to addressing the energy conservation benefits of material reuse and recycling in addition to increasing the operational efficiency of buildings.

Sincerely,

Jordan Palmer
Waste Prevention Specialist
Green Building Program
Oregon Department of Environmental Quality