



January 24, 2020

To: Oregon Environmental Quality Commission

Dear Commissioners,

Re: Support Petition to Adopt Rules on Indirect Sources of Air Pollution

We are a national nonprofit that works to advance safe walking and bicycling to and from schools, to improve the health and wellbeing of kids of all races, income levels, and abilities, and to foster the creation of healthy communities for everyone. Through our work on transportation, housing, and affordability policy in the Pacific Northwest, we serve as a catalyst for the creation of safe, active, equitable, and healthy communities.

As a result of the federal Clean Air Act's preemption provisions, Oregon has limited authority to directly regulate emissions from both new and existing non-road vehicles and engines, such as off-road construction equipment. States, however, are not restricted from adopting indirect source rules that regulate the aggregate emissions produced by on-road or non-road mobile sources within the boundaries of an indirect source. An indirect source is a physical location that attracts or may attract mobile sources of air pollution. Buildings, parking lots, construction sites, highways, ports, and rail yards are all examples of indirect sources of air pollution. We believe that air quality is an environmental justice issue that Oregon can begin to address through indirect source rulemaking.

Diesel harms people's hearts, lungs, and brains. It contributes to cancer risk, as well as heart disease and heart attacks, asthma attacks, reduced lung growth in children, birth anomalies and autism, and more. Diesel pollution exceeds the state's health benchmark in 23 of 36 counties across the state, exposing most Oregonians to toxic emissions. *And those in the greater Portland region breathe diesel at levels 4-8 times higher than the state's health benchmark.*

Those most at-risk to air pollution include children, the elderly, those with chronic health problems, people of color, and people of lower socioeconomic levels. Children, infants, and pregnant women are especially vulnerable to harm from air pollution. Reducing early exposures that cause irreversible harm can improve health outcomes over a lifetime. Low-income communities and communities of color are 2-3 times more likely to be exposed to diesel particulate matter. Diesel pollution further burdens vulnerable communities that already experience greater rates of asthma and heart disease.

We therefore support the effort underway to ask Oregon to exercise existing authority to promulgate an effective indirect source rule to control diesel emissions from otherwise unregulated and inadequately regulated pollution sources in our state. We urge the Environmental Quality Commission to vote yes: direct Oregon's Department of Environmental Quality to commence the Indirect Source Rulemaking to control diesel emissions.

Thank you,

Becky Gilliam & Kari Schlosshauer

Pacific Northwest Regional Policy Managers
Safe Routes to School National Partnership