



December 16th, 2017

Department of Environmental Quality  
700 NE Multnomah Street, Suite 600  
Portland, OR 97232-4100

### **Comment on Cleaner Air Oregon Rulemaking**

Dear Oregon DEQ,

The Concordia Neighborhood Association is very concerned about the increasing degradation of the air that we breathe. According to a 2011 EPA study released in 2015, Portland has been ranked among the worst in the nation for air quality. Further, Multnomah ranks among the worst counties in the nation for diesel particulates, which have been linked to Alzheimer's, obesity, heart defects, and cancers.

We are glad your new rules begin to address this situation, but it is essential that you make them tougher:

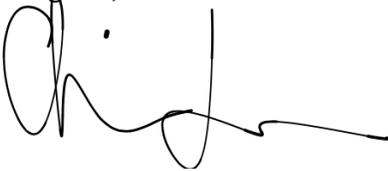
1. There should be a goal of zero net emissions by 2050. This goal should be implemented aggressively, and on a realistic trajectory to meet the goal without an assumed "cliff" of sudden action immediately prior to the deadline; rather, progress towards this deadline should be immediately noticeable, with a stretch goal of meeting it by 2035.
2. All facilities, new and existing, must be regulated the same for strict adherence to healthy air standards. These standards must be written to ensure a rapid and large decrease in emissions over current levels. Rather than being phased in over time, they should be written to encourage industry to take advantage of current favorable lending rates to re-invest in capital equipment purchases to bring about a rapid decrease in emissions. Further, the rules need to rigorously avoid loopholes. Finally, they need to be re-written to be fully comprehensible to all citizens.
3. Unfiltered industrial trucks are legal here but not in California. This is absurd, as diesel filters are not only quite affordable for large trucking operations, but more importantly they will help save lives. Oregon should require filters and institute a progressive switch away from petroleum towards biodiesel over the next decade.
4. Eliminate loopholes that give all too wide a discretion to "Director's Consultations," which

opens the door to possible corruption; and in the "Alternate Noncancer Risk Action Level (ANRAL)." Science shows that air pollution causes many more debilitating illnesses than just asthma and cancers.

5. Employ the Hazard Index (non-cancerous health impacts) of 1 at ALL risk levels. It has been well documented that the current understanding of the toxicity of air-pollutants has been widely underestimated. As new scientific findings continue to develop, we must err on side of caution.
6. Don't allow industry to claim they will suffer for protecting human health. We taxpayers pay millions annually for health concerns created or exacerbated by pollution, and industry is subsidized by our dollars. Meanwhile, Oregon industries continue to pay some of the lowest taxes in the nation.
7. Keep all citizens apprised with information about pollution in their area with more than a website or emails. Not only do a significant number of people not have internet access, but sending notifications via mail to everyone will ensure they get the proper attention. (Use 100% recycled paper to avoid unnecessary carbon impacts.)
8. Do deeper research with plant pathologists into the impacts of aerosolised particulates on plants. Urban gardeners need to know if they are growing safe food or not.
9. Ensure that every community and every non-English speaking group has access to information on polluters as well as have opportunities to speak out about their concerns. DEQ should send relevant meeting fliers home with children at all affected schools. All DEQ Community meetings should be at schools and community centers within the affected airsheds, not at the convention center, PCC, or other such locations where access is more difficult.

The health, economy, live-ability, tourist industry, and natural resources upon which all Oregonians depend on are at serious risk from toxic air pollution. We urge you to provide the leadership needed to clean up our air, and to impose equal and fairly-applied regulations as the means to doing so. Everyone in Portland and throughout the entire state will appreciate and support you in this effort.

Signed,

A handwritten signature in black ink, appearing to read "Chris Lopez", with a long horizontal flourish extending to the right.

Chris Lopez  
Chair, Board of Directors  
Concordia Neighborhood Association  
P.O. Box 11194  
Portland, OR 97211  
[chair@concordiapdx.org](mailto:chair@concordiapdx.org)

I have inserted some articles for reference, including a air quality fact sheet for our neighborhoods.

<https://www.opb.org/news/article/oregon-portland-middle-schools-plan-on-hold/>

<https://www.opb.org/news/article/portland-residents-line-up-to-grill-officials-about-air-pollution/>

[Air quality reports for inner Northeast Portland here](#)

Thank you,  
Jessica Rojas

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**Jessica Rojas**  
**Community and Environmental Engagement Manager**  
**[Northeast Coalition of Neighborhoods \(NECN\)](#)**

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