



The League of Women Voters of Oregon is a 101-year-old grassroots nonpartisan political organization that encourages informed and active participation in government. We envision informed Oregonians participating in a fully accessible, responsive, and transparent government to achieve the common good. LWVOR Legislative Action is based on advocacy positions formed through studies and member consensus. The League never supports or opposes any candidate or political party.

August 19, 2021

To: The Department of Environmental Quality (DEQ) Air Toxics Alignment
caot2021@deq.state.or.us


Re: Public comment for Air Toxics Alignment Rulemaking


The League of Women Voters of Oregon supports adequate standards for control of all sources of pollution; strict enforcement of established rules and regulations; and a comprehensive, coordinated program for management of air as a natural resource.


We are especially concerned with the lack of coordination among the many programs affecting air quality including the more recent focus on greenhouse gas emissions. Although greenhouse gases don't usually have immediate local effects, the results of climate change such as the increased frequency and virulence of forest fires do. In addition, processes which create greenhouse gases also frequently create air toxics. All 14 of the stationary sources expected to be regulated under the greenhouse gas cap and reduce directive in the Governor's Executive Order 20-04 have Air Quality permits, five are also on the CAO Group 1 and 2 call-in list, and an additional three are in the Regional Haze program. **Therefore, we strongly support having a single list of air toxics, including greenhouse gases, for use by multiple programs as one step in coordinating among programs.**

We also support the proposed expansion of the scope of the Air Toxics Science Advisory Committee to take advantage of new data that become available about the harm done by air toxics. As indicated in a [WHO news release](#), many children and pregnant women are exposed to the harmful effects of exposure to air toxics. Even in high-income countries, 52% of children under 5 are exposed to levels above WHO air quality guidelines. Not all of it is due to emissions from stationary sources, but they definitely contribute, often in BIPOC and low-income communities. When pregnant women are exposed to polluted air, they are more likely to give birth prematurely, and have small, low birth-weight children. Air pollution also impacts neurodevelopment and cognitive ability and can trigger asthma, and childhood cancer. Children who have been exposed to high levels of air pollution may be at greater risk for chronic diseases such as cardiovascular disease later in life.

Thank you for the opportunity to provide our comments on this important issue.


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