



March 8, 2021

Chair Marsh & Members of the  
House Energy and Environment Committee  
Oregon State Capitol  
900 Court Street  
Salem, OR 97301

Chair Marsh & Members of the House Energy and Environment Committee:

The Oregon Public Ports Association (OPPA) represents all 23 public ports in the State of Oregon. Our membership is diverse both in size and in geography. Members stretch from the Southern Coast at the Port of Brookings Harbor, north to the Port of Astoria and then east approximately 190 river miles along the Columbia River to the Port of Umatilla. Together, Oregon's public ports employ directly, indirectly and induce over 101,300 jobs in our state generating nearly \$600 million annually in state and local taxes. Our members are committed to environmental protection of Oregon's water, land and air but we would like to express concerns with HB 2814.

House Bill 2814 and the -1 amendment directs the Environmental Quality Commission to establish and implement an indirect source review (ISR) program to address mobile emissions sources. It would do so by directing the EQC to develop rules that would require sources of indirect air contamination to obtain permits, require public notice for permits and impose new fees to support this program.

ORS 777.065 states that "The Legislative Assembly recognizes that assistance and encouragement of enhanced world trade opportunities are an important function of the state, and that development of new and expanded overseas markets for commodities exported from the ports of this state has great potential for diversifying and improving the economic base of the state." We believe that HB 2814 will make this statutory objective more difficult and expensive and potentially inhibit the ability of ports to attract and maintain business in Oregon. We also fear that our ability to compete in a national and global marketplace could be potentially jeopardized.

Ports, in most cases do not own or control the sources of emissions that this bill attempts to regulate. Furthermore, the proposal fails to provide assistance to owners of these mobile sources of emissions to transition to cleaner burning engines. This transition will take time and we fear that passage of such a measure could result place Oregon's ports at an economic disadvantage to other port facilities on the West Coast. Our state is dependent on a transportation system to move commodities and goods in an efficient and cost-effective

manner. We believe that passage of this measure will increase the costs of getting those goods and commodities to market – thereby placing Oregon’s ports at an economic disadvantage.

Thank you for your consideration of these comments.

Sincerely,

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

Mark Landauer  
Executive Director  
Oregon Public Ports Association