

February 27, 2023

House Committee on Climate, Energy, and Environment  
900 Court St. NE - HR C  
Salem, Oregon 97301

Re: HB 3229 - Relating to fees for air pollution programs

Dear Chair Marsh, Vice-Chairs Levy and Levy, and members of the Committee:

Multnomah County asks for your support of HB 3229. This legislation would protect public health by ensuring the Department of Environmental Quality's (DEQ) air permitting programs continue to be fully staffed, ensuring continuity of operations in inspections and permitting of industrial facilities. The state's permitting of industrial facilities is **one of our region's most important existing clean air tools**.

As stated by DEQ, the Title V program implements federal air quality standards for the largest and most complex sources of air pollution. Facilities like power plants, pulp and paper mills, waste incinerators, semiconductor manufacturers, and manufacturers of glass bottles, steel, and wood products. In Multnomah County alone, there are at least 18<sup>1</sup> Title V permit holders. The value to public health of DEQ capacity in addressing air pollution through this program is clearly illustrated by the new pollution controls at Owens Brockway that are protecting the nearby community from one of the state's single largest emitters of particulate matter. Multnomah County recognizes that this program is a key pollution control strategy for Oregon's continued compliance with federal air quality standards, which is critical for protecting the public's health.

The Title V program is a requirement under Federal law that is implemented by the state. Failure to increase funding for this program, and create the mechanism to allow the program to keep pace with inflation, would harm not only public health, but also business health. Businesses in Multnomah County and throughout the state need an agency with the capacity and sophistication to process air quality permits in a timely fashion. Without adequate funding air quality permits would be even further delayed creating regulatory uncertainty and denying the state of critically needed investments in industrial capacity.

As the local public health authority, we are acutely aware of the burden of air pollution on our community's health. Air pollution causes or contributes to many of the leading

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<sup>1</sup> DEQ Permit Search Tool, accessed 2.27.23

<https://www.deq.state.or.us/aq/aqpermitonline/SearchResult.asp?sourcenum=&sourcenam=&streetaddress=&city=&zip=&county=26&deqregion=&permitnumber=&permittype=1&documenttype=1&yearissued=&currentdocumentsonly=1>

causes of death in Multnomah County, including cancer, heart disease, stroke, Chronic Lower Respiratory Disease, Alzheimer's disease, and diabetes. Air pollution impacts health across the lifecourse, affecting everything from birth weight to asthma rates.

The County is also aware that local industry needs a responsive and well staffed regulatory agency to process permits and work through regulatory issues so that businesses have the confidence to make investments in Oregon. A growing industrial base means good paying jobs for Multnomah County residents. A well funded program that provides predictable customer service to industry and consistent compliance and enforcement of clean air rules will lead to better health for the residents of Multnomah County. It's important to note that both access to well paying jobs and negative health impacts related to bad air quality are unequally distributed in our community. Low income people and people of color have experienced disproportionate exposure to air pollution<sup>2</sup>. Should the program not increase fees and lose its full staff capacity, the impact of increased delayed or uncontrolled emissions will disproportionately affect low income people and people of color in Multnomah County. A Portland State University analysis found that in Oregon communities of color are more likely to live near and face greater risks from large sources of air pollution, like those regulated under this program<sup>3</sup>.

We support this legislation that raises fees for Title V facilities for the first time in over ten years. We cannot choose the air we breathe. Multnomah County Air Quality Resolution (No. 2022-010) resolves that all people who live, work or visit Multnomah County should be able to breathe clean air, everywhere at all times and states that it is the policy of Multnomah County to prioritize reducing the cumulative burden of air pollution in environmental justice communities.

Sincerely,

**Andrea Hamberg**  
Director of Environmental Health Services  
Multnomah County Health Department

**John Wasiutynski**  
Director of Office of Sustainability  
Multnomah County

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<sup>2</sup> Multnomah County Health Department, Report Card on Racial and Ethnic Disparities, 2017.  
<https://multco.us/file/37530/download>

<sup>3</sup><https://www.opb.org/news/article/oregon-portland-study-people-of-color-polluted-neighborhoods-redlining-covid-19/?outputType=amp>