

Submitter: Chelsey Miller  
On Behalf Of:  
Committee: House Committee On Climate, Energy, and Environment  
Measure, Appointment or Topic: HB2738

Dear Chair and Members of the Committee,

I am writing to formally express my opposition to House Bill (HB) 2738, which seeks to prohibit the use of leaded fuel at race tracks in cities with a population of 500,000 or greater as of January 1, 2026. While environmental and public health concerns are valid considerations, the available data and assessments do not support the claim that Portland International Raceway's operations pose a significant risk to the surrounding community. Furthermore, a ban on leaded fuel would have a disproportionate impact on vintage racing, an essential component of the track's historic and cultural significance.

The 2017 Industrial Hygiene Assessment Report conducted by G2 Consultants found that while airborne lead was detected during racing events, all measured concentrations were well below the regulatory exposure limits established by OR-OSHA and the American Conference of Governmental Industrial Hygienists (ACGIH) (1). Specifically:

The highest recorded airborne lead concentration was  $0.97 \mu\text{g}/\text{m}^3$ , a fraction of the OR-OSHA action level of  $30 \mu\text{g}/\text{m}^3$  and permissible exposure limit of  $50 \mu\text{g}/\text{m}^3$  (1). Airborne lead was detected in select areas, such as the pre-grid zone and the southwest grandstand, but other locations—such as Turn 11 and the south perimeter—showed no measurable lead presence (1).

The assessment concluded that the definitive source of observed airborne lead could not be determined, as there are multiple potential contributors, including adjacent freeways and industrial activities (1).

Additionally, the 2022 Statement from the Oregon Department of Environmental Quality (DEQ) and the Oregon Health Authority (OHA) further reinforces that PIR's lead emissions do not pose a health risk to the surrounding community (2):

DEQ's air quality modeling overestimated risk by assuming all leaded fuel sold was used in a single day and that all fuel contained the maximum lead concentration—yet still found no measurable community impact (2).

OHA confirmed that there have been no reported cases of elevated blood lead levels in Portland attributable to PIR (2).

PIR is not classified as a point source of pollution under DEQ's regulatory authority, and its emissions do not interfere with the state's ability to meet the EPA's National Ambient Air Quality Standards (NAAQS) (2).

Given these findings, banning leaded fuel at PIR appears to be an unnecessary action that could negatively impact the racing community while providing no clear, demonstrable environmental or public health benefits.

I urge you to reject any proposal to ban leaded fuel at PIR based on the lack of scientific evidence indicating a health risk and the disproportionate impact such a ban would have on motorsports and the local economy. I appreciate your time and consideration.