



February 18, 2025

House Committee On Climate, Energy, and Environment
900 Court Street NE, HR F
Salem, OR, 97301

RE: HB 2738 - SUPPORT

Chair Lively, Vice Chairs Gamba and Levy, and members of the committee:

Neighbors for Clean Air is, a statewide advocacy organization that for over 15 years has worked to protect public health from toxic air pollution. We urge you to support HB 2738 to protect vulnerable communities from the significant health concerns associated with lead pollution.

We are concerned about the delay the -2 amendments suggest, but if there is a clear path to phase out leaded gas, that is a big improvement for a community that has been working to eliminate this for over a decade. I, in fact, became involved 2 years ago, because of the limitations of the report commissioned by Portland Parks and Rec, that was used to justify the city decision to not ban leaded gas at Portland International Raceway.

At that time, I forwarded recommendations from highly credible Oregon academic researchers, who had evaluated the PPR report, and provided a list of necessary studies to more accurately assess the risk. Recommendations from a team of PSU and OSU public health and toxics experts included: lead dust study, a moss study, a childhood blood lead study and an adult blood lead study of the workers at the track. But the City would not fund the additional studies. And the City decision was allowed to stand despite knowing that according to the World Health Organization there is no known safe blood level concentrations, as even levels as low as 3.5 µg/dL are [associated](#) with behavioral and developmental issues in children.

Any detection would have been problematic. While opponents of this bill argue that this bill is unnecessary because the use of leaded gasoline at racetracks contributes only a small amount of lead to the environment, even small amounts of lead are dangerous to vulnerable populations. And I remain very concerned about the reliance on only one report that fell far short of a comprehensive study of potential localized impacts of PIR emissions.

HB 2738 prohibits the use of leaded fuel in racing vehicles at racetracks located in cities with populations of 500,000 or more. The significant negative effects of lead on public health has [long been recognized](#), and subsequently lead content in gasoline has long been regulated. Lead is categorized as a criteria air pollutant and is regulated by the U.S. Environmental Protection Agency. The EPA has worked to reduce lead emissions since



the Agency's inception. When Congress passed the Clean Air Act in 1970, the EPA created standards for the amount of lead in motor gasoline. These standards became more stringent over time, ultimately culminating in a [total phaseout](#) of lead in gasoline for on-road vehicles by 1996.

Despite being banned on highways, leaded fuel remains legal at racetracks, exposing Portlanders to preventable harm. Current regulations do not sufficiently address this issue, leaving vulnerable populations exposed to toxic emissions. Exposure to lead can harm nearly every system in our bodies. Lead accumulates in our bones, liver, and kidneys and can get in our blood and affect the ability of blood to carry oxygen. Infants and children are [especially susceptible](#) to lead, which even in low doses can cause central nervous system damage or slowed growth. Additionally, even low levels of lead exposure in people who are pregnant can harm a developing fetus.

These health concerns are disproportionately felt by low income Oregonians. The Oregon raceway that would be affected by this bill going into effect is Portland International Raceway (PIR). Abutting PIR is the Portsmouth Neighborhood, which has the [highest percentage](#) of families living below the poverty line in Portland. Time and time again we have seen that air quality impacts disproportionately harm low-income communities. We should prioritize protecting the health and wellbeing of neighborhoods like Portsmouth that are subject to the leaded gasoline emissions of PIR.

This bill is not a total ban on leaded gasoline in racing across Oregon, but rather a narrowly tailored measure. The bill applies only to tracks within the city limits of cities with a population of 500,000 or more - meaning racetracks in densely populated areas that have the potential to harm thousands of their neighbors. By eliminating leaded fuel at racetracks that meet this criteria, we are taking a straightforward yet significant step toward improving air quality and therefore the health of our communities. We urge you to prioritize vulnerable communities' health and wellbeing and support HB 2738.

Thank you for your time and consideration of our input.

Mary Peveto

A handwritten signature in cursive script that reads 'Mary S. Peveto'.

Founder and Co-Director of Neighbors for Clean Air