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TO: Joint Ways & Means Subcommittee on Natural Resources FROM: City of Springfield Council President, Sean VanGordon

DATE: 05/11/2017

RE: Testimony in Opposition of HB 2269

Testimony Content

We have serious concerns about the Cleaner Air Oregon program that the fees in HB 2269 are intended to fund.

The City has heard from representatives from many of our core businesses in Springfield that the framework outlined could shut down manufacturing and business operations and seriously impact the economy in our community and communities like ours.

All of us support the goal of protecting the health of workers employed in manufacturing facilities and protecting our communities from potentially harmful pollutants. For example, many of the mills in Springfield have invested heavily in environmental control technologies to protect air and water from potential contamination

We believe Oregon can have both clean air and a healthy business environment with fair and reasonable air regulations. Based on the information released last month, we're concerned the direction could push employers of all sizes to curtail current operations and force them to look elsewhere to operate, in turn removing goodpaying jobs from our community.

The proposed rules could negatively affect more than just manufacturers. Hospitals (Springfield is home to the two regional hospitals in our metro area), gas stations, dry cleaners – even emergency services operations like our local 911 call centers, could be negatively impacted because they rely on generators for backup.

Some aspects of the framework are reasonable. Others would significantly increase compliance costs for the regulated community and impose new management burdens on DEQ without commensurate benefits in air quality or community health. Still other elements, such as the proposed requirement for so-called "community-wide assessments," have not been sufficiently developed by the agencies to be part of the program at its inception. Understanding details within each element of the complex framework are critically important to implementing new rules, both for the agencies and for regulated community. Until the scope of the proposed rulemaking is clear, it is premature to be proposing a fee structure to support it.

Conclusion

Again, thank you for providing an opportunity to testify on the funding priorities for the Springfield community.

I strongly urge you to give careful consideration to opposing HB 2269. Thank you for your service, and the work you do on behalf of all Oregonians.