



**Bureau of Planning and Sustainability**  
Innovation. Collaboration. Practical Solutions.

March 3, 2021

Representative Pam Marsh, Chair  
House Energy and Environment Committee  
900 Court St. NE, HR D  
Salem, OR 97301

Dear Chair Marsh and Members of the Committee,

The City of Portland supports House Bill 2814 to direct the Environmental Quality Commission to establish and implement an indirect source review program. Indirect source rule programs are effective tools to reduce air toxics exposures that are a result of aggregated mobile source emissions associated with construction and operation of indirect sources.

A statewide approach to indirect source rules is necessary to deliver equitable impacts. The concentration of air pollution from attraction of mobile sources near a building, facility, structure, installation, property, or road occurs in areas across the state. This is an important environmental justice issue in Oregon as this uneven pollution exposure often poses higher adverse health risks for communities of color and low-income populations.

Mobile emissions are not addressed in the state's Cleaner Air Oregon air toxics regulatory program. Exposures to emissions from indirect sources are also not addressed through actions in House Bill 2007 (2019). An indirect source rule program that supports controls for aggregate emissions from both on-road vehicles and nonroad vehicles and engines associated with indirect sources, as directed in House Bill 2814, is an important step towards health protection from air pollution risks in Oregon.

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This work will require funding to develop a rulemaking process and to implement indirect source rules. We strongly encourage the allocation of additional funding to Department of Environmental Quality to support these processes, so it is prioritized and funded work.

A collaborative rulemaking process to design an indirect source rule program that suits Oregon can support creative and innovative methods for emissions reductions. These methods would be in alignment with and even synergistic with other climate change, health, and environmental justice actions supported by the state. An equitable, statewide program to reduce indirect sources is an important priority to improve the health of Oregonians.

Sincerely,



Andrea Durbin  
Director

