

March 27, 2026

Apollonia Riberdy, Rule Manager
J.R. Giska, Cleaner Air Oregon Manager
Department of Environmental Quality
700 NE Multnomah Street, Suite 600
Portland, OR 97232

Re: Cleaner Air Oregon Toxic Air Contaminant Review and Update 2026 Rulemaking

Via Email: caotr2026@deq.oregon.gov

Dear Ms. Riberdy and Mr. Giska:

Thank you for the opportunity to provide comments on behalf of Oregon Business & Industry (OBI) in response to the Department of Environmental Quality's (DEQ) Cleaner Air Oregon (CAO) Toxic Air Contaminant Review and Update Rulemaking Meeting 1 held Jan. 12, 2026. Our comments focus on the technical analysis provided in the OHA Toxicity Reference Value support document dated January 2026.

OBI is a statewide association representing businesses from a wide variety of industries and from each of Oregon's 36 counties. In addition to being the statewide chamber of commerce, OBI is the state affiliate for the National Association of Manufacturers and the National Retail Federation. Our approximately 1,600 member companies, over 75% of which are small businesses, employ more than 250,000 Oregonians. Oregon's private sector businesses help drive a healthy prosperous economy for the benefit of everyone.

Our comments focus on the technical analysis provided in the OHA Toxicity Reference Value support document dated January 2026. The proposed changes to the CAO rules are critically important to Oregon manufacturers, since they can constrain manufacturers' production and compromise necessary manufacturing activities. In November 2024, the state economist stated that Oregon was in a manufacturing recession and we have continued to lose jobs and business investment since then. The Oregon Employment Department reported in December 2025 that Oregon's manufacturing jobs had fallen to the lowest number since 2013. The significant evidence of Oregon's economic struggles led Governor Kotek to appoint the Prosperity Council, which has held listening session across the state and the message of stringent regulation, high employment costs and high taxes has been very consistent.

We can have both a robust economy and a healthy environment, but sweeping regulatory changes in the absence of clear, scientifically-credible need could be especially harmful in these challenging times. There are significant technical questions that must be vetted before the TRV rulemaking moves forward and we look forward to those discussions.

Please contact me should you have questions regarding our submittals.

Sincerely,



Sharla Moffett
Senior Policy Director