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Submitted via email: CAOTRV.2026@DEQ.oregon.gov

re: Toxic Air Contaminant Review and Update 2026 Rulemaking

Thank you for the opportunity as a community representative to sit on the Rules Advisory Committee, which recently completed its review of the newly proposed toxic reference values (TRVs). I represent Oregon Physicians for Social Responsibility, a community of health care and public health professionals and advocates in Oregon who have a very long track record of supporting public policy that promotes public health.

We appreciate the careful and difficult work Cleaner Air Oregon (CAO) has done to update TRVs in service of mitigating harms to human health. We are particularly grateful that the new standard for diesel particulate matter (DPM) will bring Oregon in line with both California and Washington in enforcing a much lower threshold for acceptable levels of DPM in the ambient air. This is a clear public health win.

In their comments about the 2026 TRV update, Oregon Business and Industry (OBI) has called for a pause in the years long project to update the values. One of their stated worries is that the new rules will increase the workload in an already stretched thin agency, CAO. I find this disingenuous, since a pause in the current process would mean re-doing work already done and work that was done in a scientifically rigorous fashion by independent toxicologists and other experts in their field. I believe ODEQ should vigorously defend the work it has done and not give in to industry demands to slow the process down.

OBI characterizes the business environment in Oregon as poor, but they neglected any mention of the substantial subsidy to Oregon's industries through the externalities of damage to the public health and environment. These are costs that Oregonians are forced to cover and they are not trivial.

Multiple studies have been done to quantify the costs of these subsidies to public coffers and personal resources. The calculus is complex, but results consistently show a substantial subsidy to polluters. Calculations generally include the costs of pollution-induced illness and some calculations include the costs of environmental damage as well. Included in the former are lost productivity, premature death, and health care expenditures. Environmental costs include damage to crops, forests, and ecosystems, and contamination of soil and water. Adverse effects also include lost school days, reduction in tourism, accelerated decay of infrastructure, and overall reductions in quality of life. None of these calculations, however, include a family's anguish and suffering from the premature death of a loved one. These impacts also fall disproportionately on communities of color, low income, immigrant, and houseless communities, rendering industrial pollution a significant environmental justice issue.

In 2019, the Center for Air Quality, Climate, and Energy Solutions at Carnegie Mellon University estimated that air pollution consumes *5% of GDP annually.* The highest costs are due to sickness and premature death from PM2.5, a major industrial pollutant and constituent of DPM.

The Medical Society Consortium on Climate and Health and the Natural Resources Defense Council collaborated on a literature review and analysis of the combined costs of air pollution and climate change. Their 2021 report on costs of fossil fuel combustion alone, excluding other air pollutants, estimated an annual cost in the US of $8 billion per year.

Another 2025 comparative study of the US and India pegged the annual losses in the US from air pollution-related premature death alone at $24 billion.

The most relevant study was one conducted by ODEQ itself in 2015. Using EPA methodology, ODEQ estimated the annual economic losses from DPM alone in Oregon were $1.6 billion. That's roughly $2.25 billion in 2026 dollars.

The US Environmental Protection Agency has detailed the many benefits of the 1970 Clean Air Act on the US economy, including marked reductions in premature mortality, lost work, and school days. They estimated that costs to manufacturers for pollution abatement represented less than 1% of the value of the goods they shipped. The EPA also estimated that the return on investment in air pollution control was $30 for every $1 invested.

The studies cited below include dozens of references to other studies that come to similar conclusions.

The science on the costs of pollution externalities is complex, imperfect, and incomplete. But every source points to substantial losses borne by governments and residents from air pollution, costs for which industry is not held accountable. Any credible fiscal impact statement regarding the new TRVs needs to include recognition of these externalities. I strongly urge CAO to reject any further delay in mitigating these subsidies to Oregon industry. We simply cannot afford it.

Respectfully submitted,
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