



RE: Air Quality  
Eugene Sustainability Commission  
Submitted for consideration: February, 2021.

### **Background on Air Quality**

The World Health Organization estimates air pollution kills more than 7 million people each year and is one of the leading causes of sickness and absence from work globally<sup>1</sup>;

Poor air quality continues to negatively impact the Willamette Valley, and the unique topography of Eugene traps air pollution over the city;

The Eugene metro area has frequent spikes of air pollution exceeding safe levels throughout the winter, despite meeting averages within legal limits;

Eugene's most common and serious type of pollution is PM 2.5 generated by diesel emissions and wood burning<sup>2</sup>;

Oregon DEQ data shows that woodstoves in Oregon contribute 12.8 million pounds of hazardous particulates annually, on par with a major wildfire<sup>3</sup>;

### **Problems**

#### **Pollution Source: Home Wood Heating**

LRAPA leadership reports that *the* major cause of poor air quality in winter is residential home wood heating<sup>4</sup>; there are over 35,000 registered wood burning stoves within the city of Eugene<sup>5</sup>;

Eugene has no tracking and reporting requirements for heat sources in rental units, and an unknown number of rentals have wood burning stoves;

Uncertified stoves emit on average 5 times the particulates of new models; there are new federal tax credits for wood stove replacements<sup>6</sup>, and it is illegal to sell a home with an uncertified stove;

Indoor PM 2.5 levels can reach hazardous levels in homes with active wood heating from old stoves or poor burning practices<sup>7</sup>.

#### **Pollution Source: Mobile Combustion and Train Emissions**

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<sup>1</sup> The Guardian 1.20.21

<sup>2</sup> LRAPA interview with Merlyn Hough

<sup>3</sup> [OPB January 16, 2020.](#)

<sup>4</sup> LRAPA interview with Merlyn Hough.

<sup>5</sup> RLID, accessed January 2021.

<sup>6</sup> [Hearth, Patio, and BBQ Association](#)

<sup>7</sup> [Noonan et al. "Residential indoor PM 2.5 in wood stove homes: Follow up of the Libby Changeout program. Dec. 2021](#)

Train systems within the COE are federally regulated; however, there are opportunities for leverage by the city of Eugene, such as has been done with noise issues.

Train operators idle within the city limits at the 5<sup>th</sup> St train station, emitting significant diesel particulate pollution into an area of major economic investment;

### **Pollution Source: Air Toxics**

Three known industrial polluters within the city limits are currently being audited and reviewed at the state level through the new DEQ program “Cleaner Air Oregon” and have been fined for illegal toxic emissions.

### **Lack of Funding for Enforcement and Communication**

Enforcement of point source air pollution (industrial or other) within the city limits is based only on citizen complaints;

Funding for LRAPA outreach and education programming in the city of Eugene was greatly reduced with the 2008 budget, and never restored, primarily impacting education and enforcement within the city.

There were no points of contact between LRAPA and COE staff during the disastrous smoke of September 2021. There were unacceptable delays in creating safe, cleaner air spaces as required by state law, causing untold health impacts on the community;

### **Recommendations:**

#### **1) Wood Burning: Recommendations for home wood heating**

- **ORDINANCE** to reduce opacity limits for wood stoves from 40% to 20%, which will allow for education and intervention in polluting residential stoves at the same level as Oakridge in Lane County<sup>8</sup>.
- **POLICY** to track wood stoves in rentals: Require landlords to both report all heating sources for rentals inside the city<sup>9</sup>) when they pay their annual fees, and confirm stove certification. Landlord will pay costs of annual maintenance for working stoves.
- **ORDINANCE**: prohibit sole source wood heat in rental units and require units with wood heat to have covered wood storage<sup>10</sup>.
- **COLLABORATE** with LRAPA/EWEB to promote and fund changeouts for uncertified stoves and promote rebate programs for efficient electric heat.
- **PARTNER** with OHA, DEQ, and other state agencies to relaunch wood stove upgrades rebate program that sunset in 2017.

#### **2) Education and Outreach: Recommendations for Improved Effectiveness of Air Quality Management**

- **REVIEW** funding cuts to LRAPA and consider appropriate method to improve access to information and communication about safe burning, complaints process and smoke events, especially for non-English speakers.

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<sup>8</sup> [LRAPA.org Oakridge Ordinance](https://www.lrapa.org/Oakridge-Ordinance)

<sup>9</sup> This data gathering will feed into recommendations within the Climate Action Plan Action B3 – Report on Options for Energy Efficiency Standards in Rental Housing has a target date of 2023

<sup>10</sup> Engage the Lane County Rental Owners Association to provide data and engage in education on safe heating opportunities.

- **DEVELOP** a Smoke Management Plan with LRAPA to facilitate improved communication during smoke event.
- 3) Trains: LEVERAGE** Train operators that use the rail system through Eugene yard shall reduce airborne particulates from open cars by covering them, and prohibit idling as a standard policy.
- 4) Air Toxics: Communication Practice**
- **ASSIGN** a city staff member to follow the reports from Cleaner Air Oregon programs in Eugene and provide updates to Council.
  - **ENFORCEMENT** in the city of Eugene should include fence-line monitoring of known polluters, instead of relying upon self-reporting and citizen complaints.
- 5) Prevent Unequal impacts from Recommendations on marginalized communities**
- **WORK** with EWEB to increase access to and awareness of home electric heating funds, loans and rebates, focused on rental housing.

**The clear triple bottom line issues for the City of Eugene are:**

- Communities of color and marginalized neighbors are disproportionately impacted by the locations of high traffic corridors like Hwy 99 and the Beltline, as well as being surrounded by heavy industry in West Eugene<sup>11</sup>.
- Communication, education, and enforcement around air quality and hazards are issues of equity that have not been adequately met by LRAPA following the reduction in per resident fees in 2008.
- Health impacts cause people to miss work, harming the economy. Marginalized communities are most likely to live in neighborhoods with poor air quality, and are most in need of access to safe, inexpensive sources of heat like wood.

**Interviews and information sources:**

Merlyn Hough, Travis Knudsen, Lance Giles, LRAPA  
 Misti Frost, Beyond Toxics and LRAPA Board member  
 Lisa Arkin, Beyond Toxics  
 Rachelle, COE Rental Housing Program  
 Oakridge Air  
 EWEB, Loan Programs Office

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<sup>11</sup> EPA civil rights complaint from 2014 was confirmed in 2019. "West Eugene are exposed to 99% of all Eugene's air toxins, according to a report created by Beyond Toxics and Centro Latino Americano in 2011". (Eugene Weekly, Oct19, 2019)