



## BOARD OF COUNTY COMMISSIONERS

LINDSAY BERSCHAUER • CASEY KULLA • MARY STARRETT

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February 3, 2022

Oregon Health Authority  
Public Health Division  
Administrative Rules Coordinator  
800 NE Oregon Street, Suite 930  
Portland, Oregon 97232

RE: Comments on Oregon Administrative Proposed Rule 333-019-1025

Dear Administrative Rules Coordinator,

The Yamhill County Board of Commissioners strongly opposes the proposed changes to OAR 333-019-1025. Throughout the pandemic Yamhill County has worked tirelessly to ensure that our residents and businesses remain protected. Local control in collaboration with state agencies is essential and gives each jurisdiction the ability to respond to the needs in their community. Governor Brown has consistently stated that local control and collaboration are paramount in our state's response to COVID-19, and we are asking that she stand by her statement.

The proposed rules are inconsistent with guidance from the Centers for Disease Control (CDC) and are contrary to new, scientific findings regarding the efficacy of mask policies and the role of natural immunity. These studies are being released weekly, and changes to mask, quarantine, and vaccine guidelines are continuously being updated. Adopting a permanent rule when new data is still being released is not in the best interest of Oregonians, Yamhill County residents, or our children. Additionally, the rule fails to set requirements for when the mandate can be lifted, making vague promises of its removal when the rule is no longer necessary.

Yamhill County and its residents have consistently responded to the changes and requirements passed by OHA and OSHA. Working with community partners, our public health team has been able to direct resources where they are needed most. Local control has been critical for many communities throughout this pandemic, and we believe that should continue. With data and knowledge about COVID-19 constantly changing and being updated, the mitigation strategies of 2020 should not dictate the strategies of 2022. With the latest federal recommendation that only N95 masks and eye protection can be effective at slowing the spread, and the fact that our children are at extremely low risk for hospitalization or serious illness from COVID-19, we believe that a permanent masking policy is cruel and unwarranted. Our children are suffering from isolation, low self-esteem, learning barriers, and an unnecessary fear that the air they breathe is dangerous. As The Oregonian Editorial Board plainly stated in today's 'Editorial: Portland, Beaverton schools should let students unmask outside', "What a horrifying message to send to children". We couldn't agree more.

The Yamhill County Board of Commissioners does not support the proposed changes to OAR 333-019-1025. We ask that Governor Brown give counties the ability to make these decisions for their residents.

Sincerely,

Lindsay Berschauer  
Chair

Voted "No"

Casey Kulla  
Vice-Chair

Mary Starrett  
Commissioner

Accepted by Yamhill County  
Board of Commissioners on  
2-3-2022 by Board Order  
# 22-36