

Subject: Count loss of access as harm, and look at residential dryer vents

To the California Air Resources Board:

I am a California resident living in San Diego, and I am asking for two things in the 2026 Roadmap to Reduce Air Toxics.

First, count loss of access as a harm.

For me and for many other Californians, fragrance chemicals in shared air mean that ordinary places become unusable. Which buildings I can enter, which forms of public transportation I can take, and which medical appointments I can keep are all determined by what other people's products put into the air. Finding safe housing is often out of reach for me.

I am not unusual, and for many of us this is not a matter of occasional headaches.

In a nationally representative survey of 1,136 American adults, 34.7% reported health problems when exposed to fragranced consumer products. 22.7% had been prevented from going somewhere because they would be exposed to a fragranced product that would make them sick. 17.5% are unable or reluctant to use a public restroom because of an air freshener or scented product. 20.2% said they would enter a business and then leave as quickly as possible if they encountered a fragranced product. 15.1% had lost workdays or a job because of fragranced products in the workplace. And 17.2% reported that their health problems substantially limit one or more major life activities — the study asked this using the language of the Americans with Disabilities Act. (Steinemann, A., "Fragranced consumer products: exposures and effects from emissions," Air Quality, Atmosphere & Health, 2016.)

Losing a job is not discomfort. Being unable to use a public restroom is not a preference. These are people being pushed out of ordinary places.

This harm does not belong to any one diagnosis. People report it with asthma, with migraine, with lung disease, with mast cell disorders, with chemical sensitivity, and with no diagnosis at all. What they have in common is not a condition. It is that someone else's product decided where they could go.

In June 2025 the American Medical Association adopted policy H-135.902, recognizing that some environmental exposures may substantially limit major life activities for people with fragrance sensitivity. That is the same standard Steinemann's survey used, and it is the harm I am asking CARB to count.

I am asking the Roadmap to count that — to treat loss of access to housing, transit, workplaces, and medical care as a harm alongside the ones CARB already measures.

Second, look at residential clothes dryer vents.

A dryer vent is nobody's category right now. It is not a factory, not a vehicle, not a smokestack, so no program counts it and no rule reaches it. But scented laundry products release fragrance chemicals into outdoor air in residential neighborhoods, for hours, every day of the year. In dense housing, vents discharge a few feet from a neighbor's windows and doors, and those chemicals come inside, making many of us ill in our own homes.

This is not a marginal exposure. In the same national survey, 12.5% of the United States population reported health problems from the scent of laundry products coming from a dryer vent — mucosal symptoms, respiratory problems, skin problems, migraine headaches, gastrointestinal problems, and asthma attacks among them. That is roughly one in eight people, made ill by a product someone else bought.

I am asking CARB to include residential dryer vents in the Roadmap as a source of outdoor air pollution.

These two asks belong together. The dryer vent is the clearest example of the harm I described first. A tenant harmed by a neighbor's laundry did not buy the product, cannot identify which unit it comes from, and cannot seal a building they do not own. There is no consumer choice available and no agency to call. That person is losing the use of their own home.

There is also a remedy already sitting on store shelves. Researchers measured emissions from residential dryer vents and found that switching from fragranced to fragrance-free laundry products reduced limonene emissions by up to 99.7%. Terpenes appeared in every fragranced laundry product tested and in none of the fragrance-free products. (Goodman, N., Nematollahi, N., and Steinemann, A., "Fragranced laundry products and emissions from dryer vents: implications for air quality and health," Air Quality, Atmosphere & Health, 2020.)

Manufacturers already make these unscented versions and sell them at no extra cost. What is missing is any agency treating this as air pollution.

Thank you for accepting public comment.

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