

February 19, 2025

House Committee on Agriculture, Land Use, Natural Resources, and Water  
Oregon State Legislature  
RE: HB 3525 Opposition

Co-Chair Helm, Co-Chair Owens, Vice-Chair McDonald, and Members of the Committee:

The Oregon Farm Bureau (OFB) appreciates the opportunity to submit testimony in opposition to HB 3525, which would require landlords to test wells that serve rental properties for arsenic, E. coli, and nitrates, with results reported to the Department of Environmental Quality (DEQ).

OFB is the state's most inclusive agriculture organization, proudly representing over 6500 family farms and ranches that produce more than 220 agricultural commodities. From hops and hazelnuts to cattle, cranberries, and timber with operations spanning from just a few acres to thousands, our members utilize all farming methods including organic, conventional, regenerative, biotech, and even no-tech.

OFB represents thousands of farm and ranch families across the state, many of whom rely on private wells for drinking water and agricultural purposes. While we strongly support clean and safe drinking water, HB 3525 places unnecessary regulatory and financial burdens on landowners without addressing broader groundwater quality challenges in Oregon.

#### Concerns with HB 3525

1. **Regulatory Overreach and Expansion of DEQ Authority**  
OFB has long opposed expanding state agency authority in ways that erode private property rights. HB 3525 grants DEQ new regulatory powers over private wells by requiring landlords to submit testing data, which DEQ may use to implement additional policies. We have seen in prior legislative efforts, such as HB 3207 (2023), that DEQ has failed to invest in comprehensive groundwater monitoring while seeking to expand reporting requirements on private individuals.
2. **Lack of a Targeted, Science-Based Approach to Groundwater Protection**  
OFB has repeatedly advocated for investment in a statewide, science-driven groundwater monitoring program rather than piecemeal regulatory approaches. The

bill's reliance on landlord-funded testing does not provide a comprehensive, scientifically valid dataset to diagnose groundwater quality issues. It places responsibility for water quality assessment on individual property owners rather than on the state agencies that should be conducting broader, systemic monitoring.

3. Privacy and Data Misuse Concerns

OFB strongly opposes public disclosure of private landowner data without adequate safeguards. In past DEQ programs, publicly released data has led to false assumptions and misinterpretations about environmental conditions. HB 3525 does not include adequate protections to ensure that well data will not be misused—especially in ways that could unfairly target farmers and rural landowners.

OFB's Alternative Approach

Rather than imposing additional mandates on landowners, OFB urges the Legislature to:

- Invest in a robust, statewide groundwater monitoring program that includes targeted scientific studies rather than relying on fragmented, privately funded testing.
- Provide financial support or incentives for well testing and remediation, ensuring that rural property owners are not unfairly burdened.
- Ensure DEQ remains focused on scientific data collection rather than expanding its regulatory reach without adequate legislative oversight.

Conclusion

HB 3525 fails to address groundwater quality in a meaningful, science-based way while placing excessive regulatory and financial burdens on landowners. Rather than mandating landlord-funded well testing, we urge the Legislature to focus on comprehensive, state-led groundwater monitoring and voluntary incentive programs.

Thank you for the opportunity to provide testimony. We look forward to working with the Committee on policies that effectively protect water quality without unfairly burdening Oregon's farm and ranch families.

Sincerely,  
Ryan J. Krabill  
Oregon Farm Bureau