



February 24, 2025

Chair Darcia Grayber
Vice-Chair Lucetta Elmer
Vice-Chair Lesly Muñoz
Oregon State Capitol
900 Court St. NE
Salem, OR 97301

Dear Chair Grayber, Vice-Chairs Elmer and Muñoz, and members of the House Labor and Workplace Standards Committee,

Thank you for allowing us the opportunity to provide feedback on HB 2688. Local governments have many concerns about the bill and are opposed to HB 2688. We are concerned about our ability to enforce compliance, definitions in the bill, and the added layer of complexity this bill adds to current supply chain challenges. To be clear, we do not oppose paying prevailing wages for public improvement contracts. We want to ensure that workers in our state earn a living wage with benefits.

One of our biggest concerns with the bill as currently drafted is that local governments have no ability to track or enforce whether a manufacturer is paying local prevailing wage, particularly if that manufacturer is out of state or international. Some materials and components are not produced in Oregon or anywhere in the Northwest, while others are not produced in the United States. Local governments are already constrained with some having very little capacity to administer local services. Adding an additional burden that would be time consuming and costly will further impact services and our ability to finish projects with parts that are procured outside of Oregon, especially in rural areas of the state.

It's also not clear what the definitions of "custom" and "not standard" apply towards in section 1, page 2, lines 44-45. This language can apply to a range of materials and components that are frequently used in both locally-owned public works projects and private projects that receive local government funding. This could include but is not limited to:

- Electrical components, switchboards, traffic and electrical poles;
- Heating systems, HVAC, and boilers;
- Water systems components, pumps, ducting, and stormwater;
- Elevators;
- Public art, art fence;
- Playground equipment; or
- Custom concrete/asphalt for playgrounds, sidewalks, roads, bridges, etc.

Lastly, this bill will add additional complexity and further complicates supply chain challenges and obtaining vital materials while also significantly increasing delays. Even without this bill, it's been challenging for local governments to procure all the necessary parts or materials for projects adding to delays in construction timelines. Adding another layer to this could negatively impact local government's ability to complete important public works projects in our communities in addition to lengthier delays and driving up costs.

We as local governments are asking this committee to oppose HB 2688 as currently drafted but welcome a conversation to amend the bill. Thank you for your consideration of our feedback.

Sincerely,

