



League of Oregon Cities

March 13, 2025

House Committee On Climate  
Energy, and Environment  
900 Court St. NE  
Salem Oregon 97301

**RE: Neutral on House Bill 3512 – Local Government Perspective**

Chair Lively, Vice-Chairs Gamba and Levy, and Committee Members,

On behalf of the League of Oregon Cities, a member organization representing all 241 cities in Oregon, we appreciate the opportunity to share our perspective on House Bill 3512, which seeks to prohibit the distribution or sale of certain covered products containing intentionally added per- and polyfluoroalkyl substances (PFAS). **While we are neutral on the bill, we want to highlight the impact of PFAS on local governments, which serve as passive receivers of these substances.**

Oregon's cities are responsible for providing essential public health and environmental services, including drinking water, wastewater treatment, stormwater management, and solid waste. These systems are not sources of PFAS contamination but instead receive these chemicals through the natural course of service delivery. The presence of PFAS in drinking water sources, wastewater effluent, biosolids, and landfill leachate creates operational challenges and potential financial burdens for our communities, despite the fact that municipalities do not produce or introduce these chemicals into the environment.

Local government must comply with the requirements of the Safe Drinking Water Act and Clean Water Act, which set strict standards for water quality and wastewater discharge to protect public health and the environment. These regulations ensure that drinking water providers monitor and treat contaminants while wastewater and stormwater utilities manage pollutant levels in treated effluent and runoff. **Limits have been established for public drinking water systems and are anticipated for municipal wastewater treatment providers.** Because PFAS are persistent and difficult to remove, we anticipate meeting these regulatory obligations can be costly and complex for cities that receive these substances without contributing to their introduction.

**For the above reasons we have advocated strongly for third party liability protection at the federal level – to no avail.**

As policymakers consider HB 3512, we encourage thoughtful consideration of the role local governments play in safeguarding public health. Any approach to PFAS regulation should acknowledge that cities and their ratepayers bear the costs of managing contamination that originates from consumer and industrial products. Ensuring that regulatory measures account for

this dynamic will help avoid unintended consequences that could increase costs for residents and limit our ability to provide essential services.

We appreciate your attention to this issue and welcome further discussion on how Oregon can best protect public health while supporting the ability of local governments to fulfill their responsibilities effectively.

Many thanks,

Michael Martin – Lobbyist  
League of Oregon Cities