



March 20, 2025

TO: House Committee on Climate, Energy and Environment

FR: Sharla Moffett, Oregon Business & Industry

RE: HB 3814

Chair Lively and Members of the Committee:

For the record, my name is Sharla Moffett, senior policy director for Oregon Business & Industry (OBI).

OBI is a statewide association representing businesses from a wide variety of industries and from each of Oregon's 36 counties. In addition to being the statewide chamber of commerce, OBI is the state affiliate for the National Association of Manufacturers and the National Retail Federation. Our 1,600 member companies, more than 80% of which are small businesses, employ more than 250,000 Oregonians.

First and foremost, although the base bill would exempt seafood processors from bacteria limits in their wastewater permits, that has not been the intent of the seafood processors in their discussions with DEQ. The focus of today's discussion is the -1 amendment, which would allow seafood processors to utilize mixing zones in their wastewater discharge.

OBI supports the -1 amendment of HB 3814.

The seafood processors spent a year and a half in discussions with DEQ to craft a solution to the wastewater bacteria challenge that has universally been a challenge for this sector.

The issue of fecal sources of bacteria is unique to seafood processors because it is unrelated to human fecal sources, but Oregon Administrative Rules don't differentiate between sources of fecal bacteria and seafood processors have struggled to comply with this water quality standard. The -1 amendment would provide a reasonable compliance path for seafood processors in implementing their water quality permits.

Twenty years of research show a significantly lower risk of fecal bacteria from non-human sources, which has been validated by the U.S. Environmental Protection Agency. EPA has released new guidance and is developing alternative water quality criteria for waters impacted by non-human bacteria sources.

Seafood processing is an important economic sector in Oregon and particularly in coastal communities. Given the unique water quality challenges seafood processors have struggled to comply with and the scientifically supported low risk of using mixing zones to aid in compliance with these water quality criteria, OBI urges the committee's support of the -1 amendment to HB 3814.

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