

March 27, 2025

Oregon State Legislature
House Committee on Emergency Management, General Government, and Veterans
900 Court Street NE
Salem, OR 97301
Submitted electronically via OLIS

RE: HB 3788, Relating to public safety, grants to certain medical facilities near a tsunami inundation zone

Chair Tran and Members of the Committee:

The Hospital Association of Oregon is a mission-driven nonprofit association representing Oregon's 61 community hospitals. We appreciate the opportunity to express support for HB 3788, which would establish a program to issue grants to medical facilities located near a tsunami inundation zone. These grants would provide critical funding for medical facilities to build or expand their fuel and water storage capacity thus improving regional emergency preparedness.

The Hospital Association of Oregon believes in ensuring that our communities receive the right care, in the right place, at the right time, even during natural disasters. The continuation of health care in emergency circumstances is imperative and we believe that this bill will help foster the necessary preparedness and resilience.

Oregon has 11 hospitals located along its coastline, all of which are located within 25 miles of a tsunami inundation zone. Ten of the 11 hospitals are critical access hospitals, which means they have fewer than 25 acute inpatient beds, and in many cases are resource constrained. The hospitals are located between 30 and 75 minutes of drive time apart and all but one is located directly off Highway 101. In a natural disaster, each of these facilities will play a critical role in serving their surrounding areas, especially in the likely event that they would become physically isolated due to impaired road conditions.



Hospitals are held to national emergency preparedness standards, which assume that facilities can be re-supplied with essentials such as water or fuel within a few days. However, experts caution that will not be the case in Oregon during a largescale Cascadia earthquake event.

National Fire Protection Association (NFPA) standards for critical facilities, including hospitals, requires a minimum of 96 hours of fuel oil (storage) supply for an emergency standby power plant.¹ Federal conditions of participation for hospitals require a minimum of two separate sources of power to feed each operating room (OR) or intensive care unit (ICU) room — one from the normal power distribution and one from the emergency source. Additionally, the federal requirements state that there must be facilities for emergency gas and water supply, but the amount or duration is not defined. This short-term preparedness requirement anticipates emergency relief will be feasible.

In 2017, the Oregon Department of Geology and Mineral Industries (DOGAMI) worked with Oregon's 11 coastal hospitals to evaluate their readiness for a Cascadia event². At that time, the majority of hospitals were found to have the ability to meet normal fuel and water needs for the 96 hours, but likely not beyond that. Due to the high potential for longer-term geographic isolation of communities following a Cascadia event, the DOGAMI report recommended that fuel and water storage capacity exceed the NFPA requirements. While hospitals along the coast have updated or replaced their facilities since 2017, it is unclear how many hospitals would be able to sustain a two-week supply of fuel and water at normal operating level.

Making these upgrades is costly. There are many challenges with developing long-term fuel and water solutions, including, but not limited to, physical locations of the storage relative to the hospital along with piping connections, security of the storage, initial investment and ongoing costs of the storage, and water storage that is suitable for health care specific needs.

Many of Oregon's small rural hospitals are struggling to make ends meet. Investments from this grant program will make it easier for hospitals to improve their facilities and, as a result, their communities' overall resiliency.

We urge you to support HB 3788 to help advance the resiliency of medical facilities along the coast, so they continue to meet the health care needs of their communities.

¹ NFPA 110's Fuel Requirements Can Help Guide Backup Power Plan For Hospitals
<https://www.facilitiesnet.com/healthcarefacilities/article/NFPA-110s-Fuel-Requirements-Can-Help-Guide-Backup-Power-Plan-For-Hospitals--14338>

² Oregon Coast Hospital Preparing for Cascadia, Open-file Report O-18-03, Oregon Department of Geology and Mineral Industries, https://pubs.oregon.gov/dogami/ofr/O-18-03_report.pdf



Sincerely,



Katie Harris

Associate Vice President of Policy & Federal Advocacy
Hospital Association of Oregon

About the Hospital Association of Oregon

Founded in 1934, the Hospital Association of Oregon (HAO) is a mission-driven, nonprofit trade association representing Oregon's 61 hospitals. Together, hospitals are the sixth largest private employer statewide, employing more than 70,000 employees. Committed to fostering a stronger, safer, more equitable Oregon where all people have access to the high-quality care they need, the hospital association supports Oregon's hospitals so they can support their communities; educates government officials and the public on the state's health landscape and works collaboratively with policymakers, community based organizations and the health care community to build consensus on and advance health care policy benefiting the state's 4 million residents.



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