



## OREGON REFUSE & RECYCLING ASSOCIATION

Date: May 22, 2025

Chair Bowman, Vice-Chair Drazan, Vice-Chair Pham, and Members of the House Committee on Rules:

Re: Opposition to HB 3971

Oregon's land use laws are not known for being swift or simple. Those who work within this system are often seen as uniquely resilient, if not somewhat masochistic in their ability to endure the complexity and rigor that the process demands. While the system is undeniably challenging and often at the heart of vigorous debate, it is intentionally designed to ensure thoughtful, deliberate decision-making. At its core, Oregon's land use process mandates public input, giving communities a meaningful voice in shaping their future. This fosters transparency, accountability, and local engagement.

HB 3971 undermines these principles. By allowing "super siting" to bypass Oregon's established land use laws, the bill circumvents the very processes that protect communities from hasty, ill-considered decisions. Super siting is, in effect, the land use equivalent of the nuclear option. It overrides Oregon's Statewide Planning Goals, local comprehensive plans, and zoning ordinances. It directs approval of land use applications - such as for a solid waste facility - without requiring a public hearing. Even if a hearing were to be held, the outcome is dictated by this legislation thus rendering any offered community input meaningless from the outset.

This approach weakens critical safeguards. The pressure to expedite projects compromises established land use and environmental protection standards and result in long-term consequences that communities must bear without having had a say in the decision.

While the facility is promoted as the most technologically advanced waste processing center in the country, its core components are not new. It combines a materials recovery facility with an anaerobic digester that generates methane for energy production, alongside a composting operation. Despite its branding, the facility is essentially a consolidation of existing technologies.

The use of "super siting" authority by the State of Oregon—typically reserved for projects addressing urgent and long-term statewide concerns—appears difficult to justify in this case. Especially when alternative sites are available, the rationale for invoking such extraordinary measures is unclear.

Moreover, the proposed location was designated through a multi-year Goal 14 exception process, intended to support urban-scale development. This area received an urban overlay specifically to

attract rail-oriented distribution, technology-driven manufacturing, and other major employers. Goshen was among the first to be recognized as a “Regionally Significant Industrial Area” (RSIA), a designation created by the legislature.

Despite years of criticism that the County’s land management division is a barrier to development, the County is now disregarding its own zoning rules. At the eleventh hour, it is turning to the Legislature for a “solution” to a problem it created.

But Oregon is a State where the rule of law means something. Oregon’s land use laws are designed to allow robust public involvement in the decision-making process.

Creating exceptions to participatory laws undermines public trust, as citizens may feel their efforts to engage will be disregarded at what might be construed as the whim of political expediency. By making exceptions to laws designed to ensure transparency and participation, lawmakers risk discouraging the very civic involvement those laws were meant to promote.

I urge you to reject this bill and allow what is clearly a local issue, and a contentious one, to proceed through the established process where those issues can be addressed.

Thank you for the opportunity to testify.

Sincerely,

A handwritten signature in black ink, appearing to read "Craig Campbell". The signature is fluid and cursive, with the first name "Craig" and last name "Campbell" clearly distinguishable.

Craig Campbell  
Governmental Affairs Director

*ORRA is the statewide trade association representing solid waste management companies in Oregon. ORRA members collect and process most of Oregon's residential and commercial refuse and recyclables, as well as operate material recovery facilities, compost facilities, and many of Oregon's municipal solid waste transfer stations and landfills in almost every community in our state.*