



Dear Chair Sollman, Vice-Chair Brock Smith and Members of the Committee,

My name is Krystal Abrams, and I am the Programs Director for Beyond Toxics. I am writing to express our organization's opposition to HB 4102 without a -1 amendment.

Beyond Toxics is an Oregon-based environmental justice organization working to protect public health, climate stability, and ecosystems from harmful policies and practices. We stand in solidarity with our partner organizations who oppose this bill and share deep concerns about its implications for Oregon's environmental health, public health, and job growth.

On behalf of Beyond Toxics, we would like to thank Representative Dobson's office for the substantive conversations on the House side, and Senators Sollman, Golden, and Pham's offices for engaging in thoughtful dialogue in the Senate. We appreciate the effort to work through concerns and identify potential improvements.

Beyond Toxics is currently opposed to HB 4102 as written. However, like our partners, we recognize that with meaningful, enforceable amendments, our position could shift.

We understand the urgency surrounding DEQ's permitting backlog. Communities, workers, and businesses all benefit from a permitting system that is timely and predictable. However, we want to be clear about what this policy actively changes, and who benefits or bears the risk.

As written, HB 4102 expands third-party permitting in a way that prioritizes speed and project readiness while failing to require meaningful public interest criteria. When backlog and readiness are the primary factors, the system risks favoring well-resourced applicants seeking expedited approvals, while making it harder for communities to understand, challenge, or ensure compliance during the permitting process.

A permitting system that becomes easier for polluters to navigate, but harder for the public to oversee, moves Oregon in the wrong direction, no matter how efficiently it is packaged.

The proposed -1 amendment provides much-needed guardrails to the policy. Requiring an applicant's compliance history to be considered when determining

eligibility for expedited third-party permitting is a commonsense good-governance standard. Public interest must be prioritized and protected.

We also stand in solidarity with the labor standards provisions included in the -1 amendment. If Oregon is going to fast-track development, we should at minimum ensure prevailing wage standards and responsible labor practices are part of the equation. Efficiency cannot come at the expense of workers or community protections.

Our position is straightforward: regulatory reform must strengthen public trust, not weaken it. We do not have to choose between economic development and environmental integrity. Oregon can address permitting delays by investing in public capacity and maintaining strong oversight rather than shifting core regulatory functions into systems with fewer transparency safeguards.

Until meaningful safeguards including compliance history criteria and labor protections are adopted, HB 4102 fails to meet that standard.

We respectfully urge you not to move this bill forward without those protections firmly in place.

Thank you for your consideration.

Sincerely,

Krystal Abrams

Krystal Abrams
Beyond Toxics