



March 20, 2017

Honorable Representative Ken Helm, Chair  
House Committee on Energy and Environment  
900 Court Street, NE  
Salem, OR 97301

**RE: Support for HB 2669-Statewide Toxics Right to Know Legislation**

Chair Helm and members of the Committee:

The City of Eugene supports the passage of HB 2669 with targeted amendments based on our 21-year history of operating our local program. We request provisions in the bill to ensure consistency in data reporting requirements and to reduce the fee cap to \$5,000. These efforts will increase the impact of the bill by allowing local agencies and private businesses to 'do the right thing'.

HB 2669 is modeled after the City of Eugene Toxic Right to Know (TR2K) program and could modify the reporting structure of the Oregon State Fire Marshal's Office Community Right to Know (CR2K) program. In order to minimize reporting duplication for businesses required to report to both the CR2K program and a local community right to know program; we request that the bill require the statewide program to utilize a common database approach so that both statewide reporting information and the more detailed community program information can utilize the same statewide database. With a common database approach, data reports can be created to meet the need of both the CR2K program and a locally adopted program.

HB 2669 proposes a \$10,000 maximum fee that can be applied to any single facility. Eugene's experience has found the current statutory cap of \$2,000 creates a regressive fee structure, by limiting the amount a large business (with more material flow) pays to cover the fixed cost of the program. This ultimately increases the costs to smaller businesses (with less material flow). The City of Eugene recognizes the financial impact on all businesses of this program, and recommends the maximum fee be capped at \$5,000 and that the annual 'per FTE' fee be tied to the Portland CPI.

Eugene has a robust Toxics Right to Know program that was put into place after a popular vote, we believe communities across the state deserve the same right to know.

Sincerely,

Mayor Lucy Vinis