



HB 2476

Testimony of WaterWatch of Oregon Submitted to the House Committee on Consumer Protection and Government Effectiveness February 5, 2014

Founded in 1985, WaterWatch is a non-profit river conservation group dedicated to the protection and restoration of natural flows in Oregon's rivers. We work to ensure that enough water is protected in Oregon's rivers to sustain fish, wildlife, recreation and other public uses of Oregon's rivers, lakes and streams. We also work for balanced water laws and policies. WaterWatch has members across Oregon who care deeply about our rivers, their inhabitants and the effects of water laws and policies on these resources.

HB 2476 grants the Oregon Department of Administrative Services (DAS), with the approval of the Governor, the authority to "[a]dopt by rule uniform policies and procedures applicable to multiple state agencies, boards or commissions". See Section 1(2).

While the bill is seemingly innocuous, Section 1(2) raises concerns for WaterWatch because it grants DAS very broad authority to influence agency, commission and board actions with no stated sideboards whatsoever. For instance, the bill does not direct that any uniform policy and procedures developed by DAS be consistent with agency mission. Nor does the bill set sideboards for the scope. Nor does it direct what procedures this authority would relate do (i.e. substantive agency work vs. mail room policies). Nor does it prohibit DAS from adopting rules to govern agency action for broader state initiatives that are not directly tied to agency work (i.e. Regional Solutions, Rural Economic Development, Regulatory Streamlining, etc.).

Given the very broad latitude granted to DAS under HB 2476, it is, frankly, impossible to fully understand the reach of this bill.

We would suggest that legislators work with DAS to narrow the bill so it is clear what type of policies and procedures DAS seeks to implement, and what the sideboards and/or guidelines to those policies/procedures are.