



OREGON FARM BUREAU TESTIMONY

Joint Ways and Means Natural Resources Subcommittee

July 22, 2020

Co-Chairs Taylor and Reardon and Members of the Subcommittee:

Thank you for the opportunity to testify on the proposed budget cuts to Oregon's natural resource agencies as a result of COVID-19 related budget shortfalls. Like other Oregon industries, Oregon's farmers and ranchers have been hit hard by COVID-19 related economic impacts, as key markets dried up, supply chains were disrupted, and international trade ground to a halt. Despite these challenges, Oregon's farmers and ranchers are still farming, and working hard to bring safe, reliable, and sustainable food and fiber to local, regional, and international markets.

By way of background, Oregon Farm Bureau (OFB) is Oregon's largest grassroots agriculture association, representing over 6,000 farming and ranching families across the state. Our mission is to promote educational improvement, economic opportunity, and social advancement for our members and the farming, ranching, and natural resources industry as a whole.

Agriculture is the state's second largest traded sector industry, and the programs housed within Oregon's natural resources agencies are critical to our members' operations. While we understand that all agencies are going to need to "tighten their belts" to weather this economic crisis, we are concerned about cuts to some core program areas that will disproportionately impact our members and ultimately harm their ability to stay viable and survive the COVID-19 crisis. We ask for your help in supporting the agency programs needed to ensure Oregon's farmers and ranchers to stay in business throughout this crisis. Farms and ranches are the backbone of their local economies and supply critical goods and services needed during the pandemic.

We urge the Subcommittee to reconsider the following program area budget changes:

- **Oregon Department of Agriculture:**
 - *Predator Control Funding* (\$200,000 in ODA, \$200,000 in ODFW): Predators are a significant source of losses to livestock producers around the state. These dollars are leveraged at every level of government to provide crucial depredation support to landowners and communities.
 - *Invasive Species Council Funding* (\$280,000): The invasive species council conducts a comprehensive and coordinated effort to prevent, detect, control and eliminate invasive species harming the region's economy, health, and natural



resources. This work is critical to our natural resources industry and needs to remain well-funded.

- **Oregon Department of Forestry:**
 - *Rangeland Fire Protection Association Funding (\$185,000)*: RFPAs are the first line of defense against wildfires in many parts of Oregon. The state should continue to ensure they are funded to help quickly contain wildfires that otherwise may go unchecked and cause millions in damage to Oregon's natural resources and wildlife habitat.
 - *Increase Base Protection Cost Funding for Landowners (\$1,948,173)*: The 50/50 split between landowners and the state is fundamental to our wildfire protection system, and must be maintained.
- **Oregon Department of Fish and Wildlife:**
 - *Wolf Program (\$323,404)*: These dollars help support wolf-depredation compensation, non-lethal deterrence and technical assistance to landowners to implement the Oregon Wolf Plan. Livestock owners already bear a disproportionate burden of wolf reintroduction – eliminating this funding would be detrimental to landowner buy in to the wolf program.
- **Oregon Department of Water Resources:**
 - **Field Services Funding**: These field services dollars help fund the on-the-ground work that is critical to effective management of our state's water resources. This program is already severely underfunded, and further curtailments should not be considered.
 - **Measurement Cost Share (\$106,914)**
 - **Vacancy Savings (\$578,251)**
 - **Fund Shift (\$522,262)**
 - **Gaging Stations (\$27,186) and Observation Wells (\$50,000)**: Data collection is critical to management of our state's water resources, and we should not reduce funding that goes toward getting us the data we need to manage these resources in the long-term.
 - Further, we understand that OWRD is facing a budget shortfall due to increased litigation costs. We recognize the need for a comprehensive audit of the Department's programs and resources and support the legislature working to ensure that OWRD remains committed to its core priorities. However, cuts to key OWRD program areas without addressing the litigation expenses or reviewing the Department's prioritization of resources will only compound the issues caused by decades of underfunding and mission expansion. We urge you not to cut key field services that the Department needs to remain functional.

Contact: Mary Anne Cooper (maryanne@oregonfb.org)



July 22, 2020

Ways & Means Subcommittee on Natural Resources

Testimony on Co-Chairs' Budget Rebalance Plan

Submitted by Amelia Porterfield, Senior Policy Advisor

Co-Chair Taylor, Co-Chair Reardon and Members of the Committee:

Thank you for the opportunity to provide comments on the Co-Chairs' Budget Rebalance Plan. During this unprecedented fiscal situation, we recognize the difficult decisions before you and appreciate your leadership through these trying times.

The Nature Conservancy in Oregon works in communities across the state, managing lands and waters in varied ecosystems and partnering with ranchers, farmers, fishers, timber and environmental interests on some of the most challenging conservation issues of our time.

As the agency allotment lists and Co-Chairs' budget documents were released, TNC conservation teams, scientists and field staff reviewed the proposed reductions and considered their impact on our state. Many potential cuts would have adverse impacts on natural resource programs, but considering the tremendous financial pressure that the legislature is operating under due to the COVID-19 pandemic we have focused on highlighting those budget reductions that we believe would pose the most significant long-term impacts to major conservation priorities and threaten to undermine the fundamental structures of the programs that help to protect Oregon's natural resources:

Oregon Department of Forestry: Partnership & Planning Manager

(\$118,000 GF, \$105,000 OF, funded through administrative assessments to other ODF programs. Position is not a standalone line item on Co-Chair Agency Reduction Detail—it is imbedded in Items 265 and 276)

ODF's longtime Partnership & Planning Manager left the agency in March 2020, for a rotation with the U.S. Forest Service, leaving this vital position vacant at exactly the time the agency began constructing its allotment list. This position serves as a nexus between state and federal lands, leverages and ensures accountability for federal dollars allocated to Oregon forests, and is integral to the success of the Shared Stewardship and Good Neighbor Authority Agreements. Additionally, the Partnership & Planning Manager works with the Federal Forest Restoration Program, which is also slated for a proposed reduction under this plan (\$276,925 – Item #250). Losing capacity to restore Oregon's federal forests would exacerbate wildfire risk in communities across the state and increase state costs in future fire seasons. Finally, this position is integral to ODF's role in developing strategies for sequestering carbon in the state's natural and working lands as directed in Governor Brown's Executive Order 20-04 to reduce and regulate greenhouse gas emissions.

Oregon Department of Fish & Wildlife: Marine Reserves Natural Resource Specialist 3

(This position represents a portion of the \$217,222 GF in Marine Reserves vacancy Savings identified in the ODFW allotment list. Position is not a standalone line item on Co-Chair Agency Reduction Detail—it is embedded in Item #239: Fish Division Vacancy Savings)

Oregon’s Marine Reserves and Protected Areas Program, one of the most critical bipartisan conservation achievements on Oregon’s coast, is dedicated to conservation and scientific research. The associated monitoring and management program, now nearing its tenth anniversary, is statutorily required to undergo an assessment produced by ODFW and presented for legislative consideration in the 2023 session. The work of the Natural Resource Specialist 3—a position that happened to be temporarily vacant when the agency allotment lists were produced—is critical to ensuring the accurate compilation of data and the coordination of the assessment.

Water Resources Department: Groundwater Basin Studies Team

(Item #313, 321, and 322).

Cooperative studies are critical to understanding Oregon’s groundwater systems and sustainably managing those resources our groundwater resources for people, agriculture and ecosystems in some of Oregon’s most drought-prone regions. In some basins, groundwater aquifers are already incapable of sustaining additional development. Communities in those regions are working together to plan for the difficult road ahead, but solutions are hard to come by without the data necessary to understand the sustainability of current groundwater resources and capacity for future economic development opportunities. The elimination of this groundwater basin studies team would undermine the development of a cooperative groundwater study with OWRD & USGS in the Walla Walla Basin and significantly delay subsequent groundwater studies in other regions of the state.

Each of these positions and programs have been fought for by stakeholders across the natural resource spectrum and supported in a bipartisan manner. While we recognize the extraordinarily difficult budget climate currently facing our state, we ask you to protect the investments in these critical programs in order to keep Oregon’s natural resources—and the communities that rely upon them—on solid footing during the challenging years ahead. Oregon simply cannot afford to go years without making progress on these priorities.

Thank you.



The League of Women Voters of Oregon is a 100-year-old grassroots nonpartisan political organization that encourages informed and active participation in government. We envision informed Oregonians participating in a fully accessible, responsive, and transparent government to achieve the common good. LWVOR Legislative Action is based on advocacy positions formed through studies and member consensus. The League never supports or opposes any candidate or political party.

July 22, 2020

To: Senator Kathleen Taylor and Representative Jeff Reardon, Co-Chairs
Members of the Committee
Jt. Interim Committee on Ways and Means
Subcommittee on Natural Resources
Email jwmnr.exhibits@oregonlegislature.gov

Re: Co-Chair Rebalance Plan for Natural Resource Agency Reductions

Co-Chairs and Committee Members:

The League of Women Voters of Oregon and the League of Women Voters of the U.S. have studied a variety of natural resource issues and our members have adopted positions upon which this letter is based. We provided testimony before you during the 2019 and 2020 sessions on the budgets of most of the natural resource agencies. Like you, we have been devastated by this Covid-19 health crisis and the subsequent economic crisis. It is with that understanding that we provide comments on the Co-Chairs' Rebalance Plan for Natural Resource agencies.

A general comment: Agencies often "offered up" vacancies during their 17% cuts exercise but some of those positions are important to the agency and were only vacant due to retirement or a staffer moving or changing jobs. **The duties of some of those positions are critical to the mission of the agency and especially so related to the public health of Oregonians. As you consider these cuts, please ask the agencies the reason for the vacancy.**

With the potential of even more devastating cuts in 2021, it may be time to have more conversations around how agencies can share resources or even be combined in order to seek some savings while assuring that the missions of these agencies are met.

Dept. of Agriculture: We appreciate your prioritizing agriculture water quality and the Pesticide Stewardship Partnership.

Dept. of Environmental Quality: This agency is responsible for Oregon's clean air, water and land. These are public health issues. Although we appreciate the Co-Chairs' saving existing filled positions in the Air and Water Quality programs, the League had hoped that the Air Quality program could continue to address air quality in Oregon with the staffing secured during the 2019 session. **With the virus, good air quality is especially critical to the public health of Oregonians. Reducing the amount of vacancy savings (#220 and 221) should be seriously considered.**

You have worked over the years to move the Water Quality Program forward. The 2019-21 water quality permitting budget was premised on the consultant work and stakeholder participation you funded the last few years. **Loss of positions under #232 will again set us back. Any positions that can be saved would be appreciated.**

From a recent [report](#) to the Environmental Quality Commission:

*DEQ's Water Quality program has had a longstanding backlog of NPDES wastewater permits. The 2015 Oregon Legislature directed DEQ to hire an independent consultant to evaluate and recommend solutions to improve NPDES permit quality and timeliness. This evaluation culminated in a permit program review by MWH in 2016 and a subsequent NPDES permit issuance review evaluation by PG Environmental in 2018. The [slide show](#) may be easier to read! **The last slide indicates how far behind we still are in getting permits current.***

Dept. of Fish and Wildlife: Again, we are concerned about the “vacancy savings” in #239. The duties of these positions are important to our marine fisheries. We appreciate prioritizing the water quality program staffing.

Dept. of Forestry: The cuts continue to gut this agency just as they are restructuring and working with their contractor to get their billing up to speed. #265 reduces administrative services across the agency besides the cuts suggested in specific divisions. We know you are aware of and are planning monies for the Emergency Board in case the 2020 fire season is as bad as the drought and weather may make it and that is appreciated. But, **if we want a functioning forestry agency, a rethinking of how the agency should be funded is needed.** This industry is important to Oregon, but, just as you recently supported the Memorandum of Understanding between the forest industry and conservation groups, we need to keep the staffing to be sure the day to day work is done for all.

Dept. of Geology and Mineral Industries: We are concerned about the elimination of the Chief Information Officer (#278). Much of what DOGAMI does is data driven and that data is important to local jurisdictions, to industry and to the general public's safety. This agency is SO small that the loss of such a position may affect the work provided. The League has discussed before that, with these cuts and those we may see in 2021, it's time to see how to best provide the services of this agency by a restructuring or shared agency work.

Dept. of Land Conservation and Development: We appreciate that the staffing for the HB 2001/2003 housing legislative work is protected. We serve on the rulemaking for this work and have been impressed by the level of staff expertise and the broad and inclusive membership of the rulemaking committees. We understand that local jurisdictions did not take advantage of the full grant funding provided by you so can accept the reduction in #281 and #282. However, **#295 accepts keeping a vacancy where a staffer has moved but this planner is the representative for the Mid-Willamette Valley, a high growth area with many jurisdictions where state expertise can help with housing and economic development issues.** This is a great example where, just because there is a vacancy, the position is critical to, not only the agency's mission, but to local governments in this area. We also note that #309 reduces the Metro area (with 27 cities, 3 counties and Metro) to one planner to help these jurisdictions address Oregon's land use Goals. This reduction might also inhibit these jurisdictions as they work on both housing and jobs.

Since we follow these agencies, we also have concerns that an accounting position (#308) is being held vacant. As the fiscal arm of the legislature, you know how important it is that these agencies are good stewards of our limited dollars. It seems important that the agency assure you that their fiscal records will be able to be sound with the loss of this position.

Water Resources Dept.: With drought throughout Oregon, this agency has a critical job to assure we have “water for all”. The loss of field service personnel (#315), people who monitor and assist the fair regulation of water use may well be another public health issue, as well as critical to our agriculture industry. We are saddened by the loss of the groundwater basin study we all worked so hard to get funded. Back to 30 years before Oregon has a good handle on its groundwater. Sad. **Most concerning is that the agency needs additional funding to pay for their Attorney General services. Without that additional funding, the bills still need to be paid and that means yet additional reductions which could require 10-20 additional staff reductions at the agency.**

We note that the General Fund reductions in these agencies is 8.93%. That cut amount is a greater percentage than in the other areas of the state's budget. Yes, the League supports these other areas and we are working with others to find additional revenue to help cover the current revenue losses. But we ask that you also consider accessing not just the Education Stability Fund for education but the Rainy Day Fund to some extent to ameliorate these cuts. These agencies protect the public health of Oregonians. They assure we have clean air, clean and adequate water and good planning for housing and jobs.

Please consider our comments as you deliberate and make recommendations and final decisions on these important budgets. Thank you for listening and for your hard work during these tough times.

Sincerely,



Rebecca Gladstone
LWVOR President



Peggy Lynch
LWVOR Natural Resources Coordinator

Cc: Co-Chairs Senators Elizabeth Steiner Hayward and Betsy Johnson and Representative Dan Rayfield
Jason Miner, Governor's Natural Resources Advisor

Natural Resources Subcommittee
Testimony on Behalf of Tax Fairness Oregon
July 22, 2020

Co-Chairs Taylor and Reardon - members of the Committee

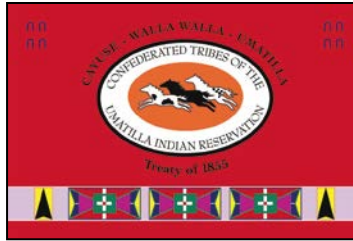
A reduction of nearly \$26 Million (4.85%) is proposed for eleven natural resources agencies. As outlined, these reductions are predicted to have limited effect, since 74% are listed as the result of not filling “vacant positions and other administrative savings” . Tax Fairness Oregon’s expertise does not lie in the realm of specific programmatic evaluation or in assessing personnel needs. However, as Tax Fairness Oregon is testifying to other committees, there is really no need for most of these reductions.

Assuming the information presented to the committee is accurate, our specific comment would be that, before any cuts are made, the legislature should disconnect from several of tax provisions in the CARES Act. As we have noted in testimony to other committees, elimination of giveaways to wealthier Oregonians in the form of retaining a limit on business loss tax deductions, applied to previous years, would save approximately \$89 Million in payments that would severely impact current revenues. As has been pointed out by the Joint Committee on Taxation in Congress, 95% of the benefit would go to people with incomes greater than \$200,000. There is no reason to think this would also not be true in Oregon.

In addition, allowing wealthier Oregonian’s to use Net Operating Losses from prior years (as provided in the CARES Act) will cost an additional \$91 Million according to the LRO.

So our recommendation is simple. Make these disconnections from the CARES Act BEFORE projecting programmatic or staffing cuts in Natural or Human Resources or other programs. This additional \$180 Million in savings might allow some of the proposed allocation cuts, like those for a 2nd groundwater basin team or additional staffing to reduce permit back logs, to be avoided.

Gerritt Rosenthal
for Tax Fairness Oregon



Joint Subcommittee On Natural Resources
Joint Ways and Means Committee
Testimony of Kat Brigham, Chair, CTUIR Board of Trustees
July 22, 2020

The Confederated Tribes of the Umatilla Indian Reservation (CTUIR) appreciates this opportunity to comment on the budget actions being contemplated for Oregon's Natural Resources agencies. One of nine federally recognized Tribes in Oregon, the CTUIR has a culture that has been and will continue to be heavily reliant on natural resources. We recognize Natural Resources as First Foods, including water, fish, big game, roots, and berries. These Foods are inter-related in both our traditional serving of them and in terms of their ecology; what affects one often affects another. We recognize that relationship in our contemporary management of these resources. And in our contemporary management we work in collaboration with many of Oregon's agencies to the mutual benefit of our tribal membership and Oregon's citizens. For these reasons, the proposed budget decisions are critically important to us.

The CTUIR understands the pandemic has created challenges and anxiety for us all, including significant budgetary challenges. We, too, anticipate similar challenges. Now, and in the near and long term though, water and water quality will be of critical importance to our citizens, our fisheries, and our economies. We collaborated with Oregon in the development of its Integrated Water Resources Strategy, the Drought Task Force, and many other work groups to advance management of water and water quality to our mutual benefit. Water is essential to all of us, but rarely is it appreciated until it is in short supply or there is conflict over its availability or quality. Reducing the capacity of the Oregon Water Resources Department to manage and protect water rights, conduct groundwater studies, provide technical assistance, engage the public, plan for future water needs and collaborate with others like us will exacerbate water management issues for Oregonians and the CTUIR for decades. If the OWRD does not have the capacity to fulfill its mission and responsibilities, such conflicts are likely only to increase.

While this is a statewide issue, we have strong interest in 1) seeing water management planning continue locally in the Walla Walla basin, and 2) for the OWRD to continue its productive collaboration in our Umatilla Basin Federal

Indian Water Rights settlement negotiations, which negotiations are nearly complete. With respect to the water settlement negotiations, to date we have agreement in principle from five major water users in the basin, and are productively negotiating with two other parties. We expect a Umatilla Basin water rights settlement agreement that can be introduced into federal legislation in 2021. When we successfully pass the legislation, our settlement will bring significant federal resources to the basin to the benefit of all in the region while avoiding litigation and addressing the CTUIR's long outstanding, unresolved water rights. OWRD has played a significant role in these negotiations. This is a priority for the CTUIR, and one which requires OWRD's continued engagement. We need to remember that together, we can often leverage resources to our mutual benefit. We thank the State for its productive collaboration to date.

The complimentary and critical aspect of water supply is water quality. Without water quality that is safe for both in-stream and human uses, the benefits of water and the needs of communities cannot be realized. The budget resources of the Oregon Department of Environmental Quality regarding water quality permitting serve to protect water quality, and that requires continued support for permitting services.

As you are aware, salmon are essential to the CTUIR and Oregon's tribes. Funding for hatchery production and maintenance is necessary for salmon production given the current limitations of habitats. In addition, funding for fish screens and passage needs to be maintained to allow fish to complete their lifecycles so that abundance can be provided for both natural benefits and people's consumption of fish.

Finally, we want to ensure that the Oregon Department of Forestry has the capacity to fulfill fire protection services in our area of NE Oregon, and for rural residents in general. We have all endured much in terms of flooding and the pandemic, but we are still in a time of overall drought. Eastern Oregon needs resources to be able to address wildfire suppression to protect the health and safety of our communities.

Again, we understand and appreciate that there are tremendous challenges before you. The importance of water and water quality are difficult to overstate, and we think the vital functions of Oregon Water Resources Department and Oregon Department of Environmental Quality need to be funded to ensure quality water is available and managed appropriately with respect to water rights, current uses, and future needs.



July 24, 2020

To: Co-Chairs Representative Jeff Reardon, and Senator Kathleen Taylor, and the members of the The Joint Committee on Ways and Means Subcommittee on Natural Resources

From: the Oregon Conservation Network

Re: Co-Chair Rebalancing Plan for Natural Resource Agencies

Dear Legislators,

The Oregon Conservation Network is coordinated through the Oregon League of Conservation Voters and is composed of over 30 organizations throughout the state that come together to pass pro-conservation priorities, protect our unique quality of life, and ensure a better Oregon for our children.

We understand that budget cuts are rarely easy and many vital services are weighed against each other. As our state faces economic hardship from an unprecedented global pandemic we recognize and understand that your committee and the entire State Legislature is in an unenviable and incredibly difficult position of having to figure out how to balance a budget in which it's clear that steep cuts must be made.

While you're faced with these unprecedented challenges we want to remind the Chairs and Members of the Joint Ways and Means Committee that clean air and water are fundamental to our health, especially in a pandemic, and air pollution disproportionately harms communities of color because systemic racism has forced Black, Indigenous, and other communities of color to live and work closest to large pollution sources, whether factories, industrial agriculture, power plants or highways. Oregon's natural resources are the basis for our economy and must be managed for the long term stability and resilience of Oregon's communities.

We are deeply concerned to see cuts in the budget that are rolling back hard fought wins for public health and the environment and we urge the legislature to balance the budget without rolling back these gains that benefit all Oregonians. Many of the agencies hit hardest in this new round of cuts have never recovered from the last round of cuts in the 2010 budget cycle. In fact, audits¹ and reports² have found agencies like the Oregon Water Resources Department and Oregon Department of Environmental Quality have been so underfunded that they lack adequate staff to perform their statutorily required programs and duties.

While we understand that agencies are reluctant to eliminate existing positions, we are very concerned about the tactic of eliminating vacant positions as a means to balance the budget. It is incorrect to assume that because a position is not currently filled it is not crucial to the core work of an agency.

¹ December, 2016: <http://records.sos.state.or.us/ORSOSWebDrawer/Recordpdf/5080986#>

² July, 2020: https://www.oregon.gov/deq/EQCdocs/07162020_C_WQPermits.pdf



Indeed, in many cases, those positions are unfilled because they are in new programs and represent hard won gains to protect Oregon's environment and the health of our communities.

We are also concerned that these cuts and the short term belt tightening will lead to long term damage to the state's economy because the state will not be prepared for future opportunities, will have opened itself up to lawsuits (particularly with the underfunding of WRD), and other detrimental impacts to our state's bottom line over time.

Below we have outlined more specific concerns and specific requests regarding the budget cuts outlined by your committee for the Special Session coming up later this summer and as we head into the 2021 legislative session.

Dept. of Environmental Quality:

Air Contaminant Discharge Permit (ACDP): DEQ has proposed leaving vacant at least 4-5 positions. Taken cumulatively, these vacancies can significantly impact the air quality permitting at DEQ. ACDP permits are used to regulate minor sources of air contaminant emissions, as well as any new major source or major modification. ACDP permits cover Title V of the Clean Air Act as well, which would cover point sources of concern like Owens Brockway (Cully neighborhood, Title V polluter), and Covanta Marion (Brooks, OR), and Zenith Energy (Northwest Portland). Without adequate staffing, adequate oversight of heavy polluters will be limited. We need adequate permitting and enforcement of air quality permits.

Air Toxics Monitoring: we should prioritize at least keeping one of the lab chemistry positions that would help monitoring of air and water toxic. Without them, this may impact the Air Toxics Reports and pertinent monitoring information groups like OEC relies on for advocacy.

Cleaner Air Oregon: This will prevent the full establishment of the program and slow assessments and implementation. The program is important because it identifies 20 initial plants to assess based on their emissions (Owens Brockway is one of them). They are typically the worst actors, and we cannot allow companies to continue skirting air quality regulations by taking advantage of state budget cuts- especially since the link between air quality and COVID-19/respiratory illnesses have been made clear. (AQ #12/13, p.3) <https://www.oregon.gov/newsroom/pages/NewsDetail.aspx?newsid=3180>.

Water Quality Permitting: Vacant positions could impact important Clean Water Act permitting reviews of proposed projects with an impact on Oregon water quality as well as delay development and implementation of watershed plans. Addressing causes of water quality impairment is increasingly important as climate change accelerates and the federal government seeks to undermine the Clean Water Act's authority. Development and implementation of comprehensive watershed plans as well as robust review and enforcement of water quality permits are needed to ensure Oregon's rivers meet water quality standards.

Oregon Dept. of Forestry:

Partnership and Planning: \$118,000 GF for a critical role in wildfire risk reduction, forest restoration, federal agency coordination and fundraising, and ODF climate change planning and mitigation strategy. This role is critical to achieve their share of EO 20-04 activities and will functionally be on hold until this

position is funded.

- This person is critical to their climate work. They already have a weak OCAP report, we have to have a person in this position for any hope of climate work in ODF.
- This position leverages and secures significant federal funding to complement state investments on forest management and wildfire risk reduction.
- This person is needed to guide wildfire prevention, work with the utilities on infrastructure safety, and restore forest health.
- Without the position there is no one to guide the study of how our forests can be a climate solution by taking greenhouse gases out of the air.

Oregon Department Of Energy:

Solar + Storage & Rebate Program: Cutting the remaining \$120,000 worth of rebates for Oregonians to put solar and storage on their homes represents the only state-level incentive for solar in many rural areas. Given our state's needs to continue renewable energy development and provide community resiliency, this cut to the solar rebate runs counter to our climate and clean energy goals. The solar and storage program is currently sustaining solar installer jobs and enabling economic development in these tough times. Our recovery from the current economic fallout should be focused on Building Back Better, and investments in solar reduce air and climate pollution, increase resilience, and lower energy bills. If the remaining rebate funding is cut, we are also concerned about the longer-term future of this program, which was hard fought for many years and is critical to green recovery efforts in our state.

Water Resources Department:

Oregon's economy and environment require at least minimal water management capacity to address the challenges presented by the intersection of climate change, economic and population growth and the needs of aquatic habitat and aquatic species. Given the critical importance of responsible water management to this state, we respectfully request that the Committee reconsider the proposed cuts to the OWRD budget that relate to science, data and water management, specifically the proposed cuts to the groundwater study work (Items # 313, 321, 322), streamflow gauging, hydrotech and field staff (water masters) (Items 315, 317, 318).

Oregon Department of Fish and Wildlife:

Marine Reserves: We also request that the Marine Reserves program remains fully staffed to ensure the program can meet its statutory requirements.

Predator Management: Items #205 and #246 – We support the recommended cuts to funding for predator control for the Department of Agriculture (\$200K) and the Department of Fish and Wildlife (\$200K). These funds go directly to contracts with Wildlife Services, the controversial U.S. Department of Agriculture program that kills tens of thousands of Oregon's wildlife each year. Wildlife Services relies primarily on lethal and inhumane methods to address conflicts with wildlife, frequently at the behest of industry interests. These funds should be cut and any additional or alternative investment should focus exclusively on more effective and humane nonlethal methods to address conflicts with wildlife.



Poaching: Items #236 and #238 – We strongly recommend that funds for ODFW’s anti-poaching campaign be restored. These funds are intended to support an integrated education, outreach, and enforcement program to address Oregon’s growing poaching problem. Poaching shows flagrant disregard for our state’s wildlife laws and the agencies charged with enforcing them, and it puts already imperiled species at even greater risk. The proposed cuts remove some of the most novel proposals for proactively addressing poaching, including the creation of a dedicated prosecutor for violations of Oregon’s wildlife laws, a robust statewide education and outreach campaign, and development of a mobile app to aid reporting. The anti-poaching funds have wide support from a diverse array of stakeholders and should be reinstated.

Wolves: Item #245 – We are concerned about the proposed cuts to ODFW’s wolf program. In particular, we are concerned that the proposed shift from general funds to federal Pittman-Robertson funds will have consequences for the administration of the wolf program. We believe that this creates uncertainty for the future of necessary personnel. Further, wolves remain a federally endangered species. Funding positions in the wolf program exclusively with revenues from the sale of sporting arms and ammunition is inappropriate.

Oregon Parks & Recreation Department:

The budget situation at the Oregon Parks and Recreation Department is dire, as the *Oregonian* reported in an article on June 2, 2020. The Department had to lay off 47 full-time employees as of the end of June. They have also been unable to hire 338 seasonal staff, just as the summer season is in full swing, when use of the coastal state parks is at its highest. Only seventy-seven of the 415 seasonal positions have been filled for 2020. This collapse of the Parks budget is due to its funding sources: Oregon Lottery funds, camping and parking fees, and RV registration fees. We request the Legislature consider general fund monies to keep at least the basic health and public safety infrastructure of the park system functioning safely. With so many people crowding the beaches, this is an urgent need.

More Regarding the Governor’s Climate Executive Order:

The Governor’s Executive Order recognizes both the urgency of the science on climate change, and the scale of the work that the State is already late in starting, as described in the State Transportation Strategy (STS). This Commission must take action now to stabilize and then reduce the growth in transportation-related greenhouse gas emissions, as the legislature directed it to do over a decade ago.

Alternative Sources of Funding:

We urge the Commission to consider using the Rainy Day Fund to further stabilize the budget struggling while weathering a global pandemic is exactly the kind of situation the Rainy Day Fund exists to ameliorate.

Conclusion:

A number of OCN member organizations have submitted detailed comments that expand on the more general points made in this letter, we urge you strongly consider all of these recommendations—the health of our communities, the environment and wildlife, and our future economic stability depends on



making wise decisions now about how to best use our limited State resources. We understand the Commission is faced with historically challenging decisions and we urge you to do what is best for the people of this state now and for future generations, and for the foundation of our economy; Oregon's natural resources of Oregon.

Sincerely,

A handwritten signature in black ink that reads "Julia B. DeGraw".

Julia B. DeGraw
OCN and OLCV Coalition Director
Oregon Conservation Network

A handwritten signature in black ink that reads "Doug Moore".

Doug Moore
Executive Director
Oregon League of Conservation Voters

Cc: Senate President Peter Courtney
Senate Majority Leader Rob Wagner
Speaker of the House Tina Kotek
House Majority Leader Barbara Smith-Warner
Governor's Natural Resources Policy Manager Jason Miner
Governor's Natural Resources Policy Advisor Amira Streefer
Legislative Fiscal Office Principal Legislative Analyst Paul Siebert
Legislative Fiscal Office Senior Legislative Analyst Michelle Deister
Legislative Analyst: Matt Stayner

Members of The Oregon Conservation Network:

1000 Friends of Oregon | Audubon Society of Portland | Beyond Toxics | Cascadia Wildlands | Center for Biological Diversity | Central Oregon Landwatch | Climate Solutions | Engineers for a Sustainable Future | Defenders of Wildlife Environment Oregon | Friends of the Columbia Gorge | Friends of Mt. Hood | Greater Hells Canyon Council | League of Women Voters of Oregon | Native Fish Society | Neighbors for Clean Air | Oceana | Oregon Coast Alliance | Oregon Environmental Council | Oregon Physicians for Social Responsibility | Oregon League of Conservation Voters | Oregon Natural Desert Association | Oregon Land and Water Alliance | Oregon Wild | Renewable Northwest | Rogue Riverkeeper | Trout Unlimited | Tualatin Riverkeepers | Rogue Valley Audubon Society | Sierra Club Oregon Chapter | Surfrider Foundation | Umpqua Valley Audubon Society | WaterWatch of Oregon | Wild Salmon Center



July 24, 2020

Senators Steiner-Hayward and Johnson, Representative Rayfield, Co-Chairs Ways and Means Committee
Senator Kathleen Taylor and Representative Jeff Reardon, Co-Chairs
Ways and Means, Subcommittee on Natural Resources
Oregon State Capitol
Salem, OR 97301

Re: Co-Chair Rebalance Plan for Natural Resource Agency Reductions

Co-Chairs and Members of the Committee,

Renew Oregon is the state's largest, most diverse coalition of businesses and workers, healthcare professionals and parents, farmers and ranchers, faith and community organizations, and individuals coming together to move away from dirty, polluting energy to a clean energy economy.

We appreciated Representative Reardon's remarks at the top of the hearing (07/22/20), reminding us that too often the "shorthand" in budget discussions or legislative work relegates the work this committee does to inanimate "natural resources" or "environmental" concerns. We're talking about the people of Oregon and the things we depend on to live and thrive -- clean air, drinkable water, and healthy soil for growing food. The pandemic health crisis has pulled back the curtain on how vulnerable so many Oregonians are on these vital elements of a healthy life. Now is not the time to further reduce protections in these areas.

Respectfully, we urge you to reconsider some initial proposed cuts to critical climate and clean air programs during this public health emergency.

Department of Environmental Quality:

In order to make the budget cuts asked of them, DEQ has proposed leaving 4-5 positions vacant in the Air Quality division. Taken cumulatively, these vacancies can significantly impact the air quality permitting at DEQ. Air Contaminant Discharge Permits are used to regulate minor sources of air contaminant emissions, as well as any new major source or major modification. ACDP permits cover Title V of the Clean Air Act as well, which would cover point sources of

concern like Owens Brockway (Cully neighborhood, Title V polluter). Without adequate staffing, adequate oversight of heavy polluters will be limited. We need adequate permitting and enforcement of air quality permits

A delay in this work, by not hiring these positions, hinders the work to relieve the air quality permit backlog, meaning more industries will be operating on expired permits, and not using the latest health based standards. Also, existing staff may be taken away from the Cleaner Air Oregon program to process permits, meaning the risk assessment work of CAO may be on hold.

Department of Energy:

In a period of years in which significant action to protect Oregonians from climate change has eluded the legislature, cutting the remaining \$120,000 worth of rebates for Oregonians to put solar and storage on their homes takes away a critical incentive for clean solar energy - particularly in many rural areas.

We propose the remaining dollars in this already modest program should be directed to provide rebates to low-income families for solar, which the program is already structured to deliver. This would ensure the benefits flow to Oregonians who need them most while sustaining solar installation jobs and preserving a program that will be a cornerstone for our state's efforts toward an equitable, clean energy recovery.

Department of Forestry:

Please protect the \$118,000 General Fund for a critical role in wildfire risk reduction, forest restoration, federal agency coordination and fundraising, and ODF climate change planning and mitigation strategy. Cutting the climate coordinating position at ODF during the worst climate-caused wildfire seasons on human record would amplify harms we've seen in previous years fire seasons, and limit the important forestry work that needs to happen moving forward. This one position leverages and secures significant federal funding to complement state investments on forest management and wildfire risk reduction. Let's not leave federal money on the table.

People all over our state are suffering the impacts of the COVID-19 pandemic. There are no easy decisions when you're asked to scale back the state budget. Your job as leaders is and will be incredibly difficult in the coming months and years. We appreciate all you've done already to navigate our state through these unprecedented times. Thank you for your consideration.

Sincerely,

Brad Reed
Communications Director
Renew Oregon

July 23, 2020



To: Legislative Joint Committee on Ways & Means (Education and Natural Resources Subcommittees)
RE: **Budget Cuts to Avoid or Minimize: Sagebrush, conservation, rural communities**

Dear Senators and Representatives:

Millions of acres of sagebrush exist in Oregon (spanning roughly $\frac{1}{3}$ of the state—8 counties, several of which are larger than eastern states). These lands, known to some as Oregon's Outback or High Desert, are far from the population centers and political power bases of Oregon, but they are critical to rural communities, economies and the conservation of hundreds of wildlife species. This includes the Greater sage-grouse, whose habitat and populations have declined such that it is frequently in the headlines for potential listing under the federal Endangered Species Act (ESA).

In late 2015, the federal government determined not to list the bird based on the collaborative efforts of states and local partners across the West. In Oregon, this included a diverse collection of entities from rural, statewide, private landowner and business sector, government and non-government backgrounds who, under the umbrella of the SageCon Partnership, produced the [Oregon Sage-Grouse Action Plan](#) and related rules and voluntary agreements. The Action Plan also links with federal agency plans creating a unified conservation framework across the state. Oregon's effort has been recognized as a key piece in averting the need for an endangered species listing west-wide.

The sagebrush ecosystem remains one of America's most imperiled, and the rural communities in this landscape often feel similarly threatened. Further enhancing and investing in Oregon's Action Plan commitments is what's needed at this point in time. Needs relevant to areas including wildfire risk, treatment of invasive annual grasses, and economic development planning in a manner that supports wildlife conservation, rural communities, and economies have continued to grow, whereas state investment since 2015 has not. The undersigned organizations and individuals all appreciate that the State is now in belt tightening and budget cutting mode given the realities of COVID-19 impacts. **The undersigned diverse partners write to encourage you to avoid or minimize cuts in the following program areas**, which are critical components of Oregon's Action Plan as well as the health and well-being of rural communities, wildlife conservation, and effective collaboration.

- **Oregon Department of Forestry (ODF): Liability insurance reimbursement for Rangeland Fire Protection Associations (RFPAs).** ODF provides essential support to RFPAs, which are volunteer-based entities that provide wildfire protection on otherwise unprotected rangelands. Given the number of volunteers and hours committed to training and fire response, RFPAs provide bargain value to the State as a true force multiplier in wildland fire initial attack. Wildfire risk remains extreme across Oregon's rangelands, and mitigating this risk is a key factor in the habitat conservation and ESA regulatory context. Cuts to ODF's ability to reimburse RFPAs for liability insurance would chill the ability of RFPAs to responsibly serve a role neither the state nor federal BLM has the capacity to fill. Cutting a needed and relatively inexpensive line of important RFPAs support would represent a penny-wise and pound foolish decision in the context of a fire season that is just beginning.

- **Department of Land Conservation and Development (DLCD): Staffing and county support capacity related to sustainable economic development.** DLCD plays an essential role in working with county planners and others in implementing Oregon’s nationally recognized land-use system. In 2015, as part of the effort to avert the need for a federal ESA listing, the State adopted a Goal 5 rule relevant to sage-grouse habitat protection. DLCD needs staff capacity to advance this rule and related economic development opportunities with already capacity-limited county planning offices.
- **Higher Education Coordinating Commission (HECC): Statewide Programs—technical and coordination support.** Staff from Oregon State University’s Institute for Natural Resources as well as Portland State University’s National Policy Consensus Center (Oregon Consensus / Oregon Solutions programs) have been the backbone the State’s 8+ year effort to provide data, tools, technical products as well as coordination and conflict resolution capacity across multiple layers of governments and diverse affected interests. Support for this work has already declined over time and further cuts would undermine important outcomes. Keep these statewide programs whole.
- **Other agency cuts or staffing shifts:**
 - Proposed cuts to Oregon Department of Fish & Wildlife’s mitigation coordinator position should ensure this position’s ability to effectively function (it is our understanding cuts are limited to non-essential S&S). The position is of central importance to the State’s approach to balancing wildlife conservation and economic development.
 - Due to COVID-19 demands or other reasons, our understanding is staff in several natural resource agencies have been shifted away from programs relevant to Action Plan implementation and into other programs. This includes Oregon Department of Agriculture noxious weed program staff, as well as Oregon Watershed Enhancement Board staff. Please ensure shifts are not permanent and programs relevant to Action Plan success are re-staffed.

On behalf of the following partners, thank you for your consideration.

Respectfully,

Portland Audubon (Bob Sallinger)	Association of Oregon Counties (Lauren Smith)	Oregon Cattlemen's Association (Tom Sharpe)	Oregon Association of Conservation Districts (Jan Lee)
Oregon Natural Desert Association (Mark Salvo)	Baker County (Commissioner Mark Bennett)	Lone Pine Rangeland Fire Protection Association (Ron Whiting)	Malheur SWCD (Linda Rowe)
Willamette Partnership (Sara O'Brien)	Harney County (County Judge Pete Runnels; former Judge Steve Grasty)	Roaring Springs Ranch (Stacy Davies)	Harney SWCD (Shannon Brubaker)
East Cascades Audubon Society (Stu Garrett)	Lake County (Commissioner Mark Albertson)		Lakeview SWCD and Fort Rock / Silver Lake SWCD (Justin Ferrell)
Intermountain West Joint Venture (Bruce Taylor)			Malheur Watershed Council (Kelly Weideman)



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OREGON DAIRY FARMERS ASSOCIATION TESTIMONY

Joint Ways and Means Natural Resources Subcommittee

July 22, 2020 Hearing

Co-Chairs Taylor and Reardon and Members of the Subcommittee:

Thank you for the opportunity to submit testimony into the record on the proposed budget cuts to Oregon's natural resource agencies as a result of COVID-19 related budget shortfalls. Like other Oregon industries, Oregon's dairy farmers were hard hit with the simultaneous closure of schools and restaurants which immediately affected the delivery points for processed dairy products which resulted in cutting by half the payments to our producers for their fluid milk. As restaurants work to comply with new distancing standards and reopening protocols, the demand for dairy products is slowly and steadily adjusting upward. However, it is likely to take months for the affected dairy farmers to recover. Regardless of this pandemic, our producers have worked every day to protect their workers, care for their cows and the environment to deliver the high-quality fluid milk they are known for.

By way of background, the Oregon Dairy Farmers Association was formed in 1892 to represent dairy farms of all sizes from small to large and organic or conventional practice. The ODFA continues to passionately promote, protect and preserve the dairy industry. The dairy industry contributes significantly to the State's economy and is frequently ranked number four or five in the State's top commodities.

The State Agencies most typically engaged with the regulatory oversight of our dairy producers include the Oregon Department of Agriculture, Oregon Water Resources Department and the Oregon Department of Fish and Wildlife. We understand the pandemic has resulted in the need for budget reductions for every State Agency. However, we urge the Legislature to carefully consider the impacts of reductions to these agencies and the nexus to the production of food for Oregonians and beyond. A lesson learned from the pandemic is the importance the consumers are placing on knowing where their food is sourced and how it is produced together with assurance for a reliable distribution system. The seasoned staff of Oregon's Agriculture/Natural Resource agencies ensure food is produced in compliance with existing regulations to protect the environment and the welfare of the livestock.

We urge the Subcommittee to reconsider the following program area budget changes:

- **Oregon Department of Agriculture:**

- Predator Control Funding (**\$200,000 in ODA, \$200,000 in ODFW**): Predators are a significant source of losses to livestock producers around the state. These

Oregon Dairy Farmers Association Testimony
Joint Ways and Means Natural Resources Subcommittee
July 22, 2020 Hearing

dollars are leveraged at every level of government to provide crucial depredation support to landowners and communities.

- Invasive Species Council Funding (**\$280,000**): The invasive species council conducts a comprehensive and coordinated effort to prevent, detect, control and eliminate invasive species harming the region's economy, health, and natural resources. This work is critical to our natural resources industry and needs to remain well-funded. The control of invasive species is not a rural or urban issue. It is very clearly a statewide issue.

- **Oregon Department of Fish and Wildlife:**

- Wolf Program (**\$323,404**): These dollars help support wolf-depredation compensation, non-lethal deterrence and technical assistance to landowners to implement the Oregon Wolf Plan. Livestock owners already bear a disproportionate burden of wolf reintroduction – eliminating this funding would be detrimental to landowner buy in to the wolf program.

- **Oregon Department of Water Resources:**

- Field Services Funding: These field services dollars help fund the on-the-ground work that is critical to effective management of our state's water resources. This program is already severely underfunded, and further curtailments should not be considered.
 - Measurement Cost Share (**\$106,914**)
 - Vacancy Savings (**\$578,251**)
 - Fund Shift (**\$522,262**)
- Gaging Stations (**\$27,186**) and Observation Wells (**\$50,000**): Data collection is critical to management of our state's water resources, and we should not reduce funding that goes toward getting us the data we need to manage these resources in the long-term.
- It has come to our attention OWRD is facing a budget shortfall due to increased litigation costs. Cuts to key OWRD program areas without addressing the litigation expenses or reviewing the Department's prioritization of resources will only compound the issues caused by decades of underfunding and mission expansion. We urge you not to cut key field services that the Department needs to remain functional.

Contact: Tammy Dennee (tammy.dennee@oregondairyfarmers.org)
Tami Kerr (tami.kerr@oregondairyfarmers.org)

July 22, 2020

Joint Committee on Ways and Means Subcommittee on Natural Resources
Oregon State Capitol
900 Court Street NE, Room H-178
Salem, Oregon 97301

Co-Chairs Reardon and Taylor and Members of the Committee:

The Special Districts Association of Oregon represents approximately 950 districts across the state that provide a wide range of services including municipal water, wastewater and storm water services. SDAO's Water and Sanitary District Chapter would like to thank you for your consideration of the following comments regarding the proposed cuts to the Department of Environmental Quality's Water Quality Division and the Water Resources Department.

At the outset, we appreciate and understand the difficult budgetary decisions this pandemic is forcing you to make. Many of our members are also facing difficult budgetary decisions. But during these unprecedented times our water and wastewater providers have stepped up and have continued to deliver reliable and safe drinking water and wastewater treatment services.

After years of lackluster progress and spurred by a budget note requiring the the Department of Environmental Quality to conduct an independent review of the water quality permitting program the department's leadership began discussions with stakeholders on how to improve its performance in the issuance and quality of its permits. During the 2019 Legislative Session, Co-Chair Reardon presided over a small group of representatives from DEQ and wastewater treatment providers including SDAO, the Association of Clean Water Agencies and the League of Oregon Cities. Those discussions resulted in a commitment by the wastewater service providers to incur substantial fee increases over the coming years in order to invest in the needed improvements to the program. We are very concerned that some if not much of the progress we made in 2019 will be lost as a result of the proposed cuts to this program.

Funding for this program is critical for all communities who are required to comply with the Clean Water Act. Providing timely and high-quality permits allows our communities to be placed in a position to be able to plan, design and implement system improvements. Not only does it improve our environment, it also benefits our citizenry and economy because those individuals, non-profits, retailers, manufacturers, hospitals, and restaurants rely on our services being executed in an efficient, effective, and affordable manner.

The Water Resources Department's \$3.6 million in proposed GF budget cuts are difficult. However, the big concern for our members is the unresolved matter of the department's legal costs. The department expects to incur as much as \$900,000 in legal expenses this biennium. If the department is forced to absorb this cost, we fear that they will be forced to make as many as 15 layoffs in what is a relatively small state agency.

The importance of ensuring that the department can maintain its core functions including conducting transactions like issuing water rights, certificates, and transfers cannot be over-stressed. Municipal water providers from across the state rely on this department to conduct transactions. Those transactions enable our members to provide clean, safe, reliable drinking water not only to our citizens, but to our businesses, hospitals, schools and non-profits.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Landauer", with a long horizontal flourish extending to the right.

Mark Landauer
Lobbyist
Special Districts Association of Oregon



To: Co-Chair Taylor; Co-Chair Reardon; and Members of the Joint Ways & Means Natural Resources Subcommittee

From: Tracy Rutten, League of Oregon Cities

Date: July 24, 2020

RE: Proposed Reductions/Vacancy Savings for Department of Environmental Quality & Oregon Water Resources Department

The League of Oregon Cities appreciates the opportunity to provide written testimony on the proposed budget reductions for the Oregon Water Resources Department and Department of Environmental Quality. As indicated in my testimony before the committee on Wednesday, July 22; we appreciate the difficult budget decisions that the legislature must make. As local government partners, we are also experiencing revenue shortfalls resulting in critical cuts to staffing and services at the local level.

We encourage the legislature to work with these agencies to identify positions that are proposed to be cut, or delayed in hiring due to current vacancies, but that provide core service work for the departments. As we work to provide feedback on budget development each biennium, our top priority has been to protect the core work of these agencies. We are resistant to supporting new programs if we believe that the core, fundamental work of the agency is not being adequately funded or is not meeting key performance measures. This core work includes water rights transactions processing for the Oregon Water Resources Department and permit-related work within the Oregon Department of Environmental Quality.

Oregon Water Resources Department: With this, we would encourage the subcommittee to consider the request from OWRD to provide for additional funding to cover litigation cost of \$860,000 to avoid even more drastic cuts than stakeholders had anticipated. Without this funding, the cuts to OWRD represent \$4.5 million as opposed to the rebalance plan reductions of \$3.6 million that we had anticipated. We are particularly concerned over proposed vacancy savings within the Water Rights Services Division (item # 320) including a water rights application processor analyst and adjudications/water rights extension processor position. These positions would have resulted in work to address workload needs across the water rights sections for processing water rights transactions and improving water right processing times. While protecting this core work is our top priority, we also share in concerns over further delay to groundwater studies that will result from proposed delays in hiring positions for groundwater studies.

Again, we reiterate that the subcommittee should work with the department to identify vacant positions that may represent core work that needs to be done and may create costly backlogs or delays in customers seeking to obtain or transfer water rights. In order to be best positioned for future

infrastructure investments, which will likely be a key aspect of economic recovery for the state, we must have the resources and staffing in place to ensure those investments can be made with the water rights transaction work to support those investments.

Department of Environmental Quality: Similarly, the proposed cuts to the Department of Environmental Quality's water quality division exceed what we had anticipated. We encourage the committee to reconsider proposed cuts to the water quality laboratory and permitting program found in item # 231, 232, 233, 234, and 235 of the plan. We have worked hard in the past few years to make targeted investments in the water quality division, particularly in the permitting program, to ensure that the state can begin to address the longstanding backlog of water quality permits that has resulted in litigation and delays in making needed improvements to water quality infrastructure. Local governments have supported recent fee increases to ensure that we can begin to address the backlog by not only funding permit writer positions but also funding the work and tools that are necessary to ensure that permits are implementable and practicable for permit holders. Failure to ensure that these fundamentals are in place can result in delayed permits (resulting in delay of necessary infrastructure investments); poor water quality outcomes; increased litigation for the state and/or local governments; and unnecessary costs for local governments who may be required to implement permit conditions that are unreasonable and unnecessarily costly. Any relief that the legislature can provide to preserve investments in the water quality program (especially to the permitting program) are encouraged.

Thank you again for the opportunity to submit this testimony. The League of Oregon Cities has also submitted testimony regarding proposed cuts to the Department of Land Conservation and Development (see testimony submitted from Ariel Nelson, LOC lobbyist). We are happy to answer any questions. Please contact Tracy Rutten (trutten@orcities.org) should we be able to answer any questions or provide additional information.