



TESTIMONY ON HB 2250
BEFORE THE HOUSE
ENERGY & ENVIRONMENT COMMITTEE

February 6, 2019

Good afternoon and thank you for the opportunity to testify on HB 2250. My name is Kelsey Wilson and I'm here representing Oregon Business & Industry. OBI represents approximately 1,600 businesses that employ nearly 300,000 Oregonians.

That said, I'm here today to express OBI's opposition to HB 2250.

OBI's membership works closely with the air and water quality programs within DEQ and have been engaged in air and water quality standard updates, TMDLs and updated NPDES permits for the last several years.

Our interest is in ensuring that DEQ's water and air quality work is completed in a timely fashion, sufficiently resourced for DEQ to be making the appropriate policy calls at the appropriate level, and, most importantly, based on the best available science.

In Oregon, DEQ has been delegated authority to administer the federal Clean Water Act and Clean Air Act, and Oregon has always had the authority to regulate beyond the federal standards. As such, requiring DEQ to undertake this analysis when it is already severely behind on its workload would only exacerbate its existing resource constraints and set Oregon even further behind on updating its permits.

Further, we are concerned that this analysis could open DEQ up for litigation if it wants to update water and air quality standards based on new information and science. Environmental regulation should be based on the best available science, and should not be "frozen in time" based on changes in federal administrations. Oregon should continue to use its own data and analysis to determine whether its regulations are sufficiently protective of public health, and we do not support requiring the agencies to invest additional resources in conducting new analyses of federal law when their time should be focused on improving our programs here at home.

Thank you for the opportunity to testify.