

February 19, 2019

Honorable Kathleen Taylor and Jeff Reardon
Co-Chairs, Joint Committee on Ways and Means, Natural Resources Subcommittee

SUBJECT: HB 5017 and HB 5018

Dear Sen. Taylor and Rep. Reardon and members of the Committee,

Clean Water Services is a county service district providing wastewater collection and treatment services, stormwater management services and managing flow in the Tualatin River to protect water quality and fish habitat for more than than 600,000 residents and business in urban Washington County. Everything we do aims to protect public health, while enhancing the natural environment.

Clean Water Services, cities, counties and special service districts across the state of Oregon have a long-standing partnership with the Oregon Department of Environmental Quality (DEQ) to protect Oregon's waterways. We share DEQ's objective and commitment to protecting public health and improving water quality through sound public policy and the timely issuance of scientifically based, implementable permits that provide meaningful improvements to Oregon's environment and economic health.

In order to do this, DEQ needs resources for all aspects of its water quality mission, including the Total Maximum Daily Load (TMDL), water quality standards and permitting programs. Without these programs working together, DEQ will not be able to develop comprehensive policies or to issue permits that provide meaningful results and may put community ratepayer investments at risk of legal challenges.

The DEQ budget package before the Natural Resources Subcommittee of the Ways and Means Committee includes a large amount of additional resources and staffing focused exclusively on the Water Quality Permitting program without the necessary resources to develop comprehensive, legally defensible policies and permits. We are writing to support a more modest and balanced approach that would distribute the assigned resources across the entire Water Quality Program.

We acknowledge and appreciate the strides made by new leadership at DEQ, but more needs to be done to improve the permitting process, work quality, responsiveness, and accountability. Until this is complete, is difficult to truly understand the needs of the Water Quality Program. The number of permits is not the only consideration, quality and implementation are also important. In addition, fee impacts must be considered. The DEQ budget package would result in permit fee increases greater than 40% over the biennium. Such increases severely impact the ability of municipalities to meet their many environmental responsibilities.

Specifically, we request the Natural Resources Subcommittee to:

- Balance new resources across the TMDL, water quality standards, and permitting programs and limit permit fee increase to a reasonable amount;
- Ensure all Oregonians are investing in clean water by retaining public investment in an effective permit program by adhering to the longstanding 60% fees/40% general fund agreement; and
- Maintain the current stormwater fee structure with no increases. Clean Water Services permit fee went up 738% in 2018 and was not balanced with any general fund support.

Thank you for your attention to this matter. If you have any questions or require additional information, please do not hesitate to contact Mark Jockers at 503.681.4450;
JockersM@CleanWaterServices.org.

Sincerely,



Diane Taniguchi-Dennis
Chief Executive Officer