



February 21, 2019

**Clackamas County Board of Commissioners
Policy Position
Oregon Department of Environmental Quality Proposed Budget re: Water Quality Permitting**

Clackamas County comments on the proposed budget for DEQ: The Board of County Commissioners, in partnership with its water quality district Water Environment Services (WES), share Oregon Department of Environmental Quality's (DEQ) commitment to protecting public health and improving water quality through sound public policy and the timely issuance of scientifically based permits.

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 improvements to Oregon's environment, and may put community ratepayer investments at risk of legal challenges. These are challenges that our communities cannot afford to risk.

The current proposed DEQ budget includes a large amount of additional resources and staffing only in the Water Quality Permitting program. Clackamas County and WES support a more modest and balanced approach that includes providing resources to the important foundational programs referenced above. We 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. The quality and ability to implement issued permits are important, and having high quality permits that work on the ground will allow all the parties to avoid wasted resources from clarifying appeals that might otherwise arise. In addition, fee impacts to small and local communities must be considered.

Additionally, the current DEQ budget proposal would result in permit fee increases greater than 40% over the biennium, which would be a substantial burden on our ratepayers and our communities. Clackamas County and WES support a more balanced approach that should include several important elements:

- The 40% rate increase in the proposed budget is too high for local communities
- Balance new resources across the TMDL, water quality standards, and permitting programs
- 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
- No increase in stormwater fees for the permitting program because increases in 2018 were too high and were not balanced with any general fund support for the permitting program
- Resuming support of hands-on involvement of regional staff in permitting
- Increased accountability for the agency

We strongly urge the state to adequately fund the DEQ program without significant fee increases.

Please contact Chris Lyons at clyons@clackamas.us for more information.