



ROSEBURG URBAN SANITARY AUTHORITY

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February 21, 2019

Senator Taylor, Representative Reardon, and Members of the Subcommittee
Joint Subcommittee on Natural Resources
900 Court Street NE, HR H-174
Salem, Oregon 97301

Dear Members of the Subcommittee:

Roseburg Urban Sanitary Authority provides sanitary sewer service to the City of Roseburg and the Urban Growth Boundary adjacent the City. Roseburg Urban Sanitary Authority's (RUSA) conveyance system is approximately 15.6 square miles and services approximately 11,000 connections. RUSA maintains over 160 miles of sewer main line, nine pump stations and the wastewater treatment plant.

Roseburg Urban Sanitary Authority operates with only the revenue generated by our customer sewer fees. Increases in operational costs (permit fees, etc.) are shouldered by the residents of our area in a county that has been identified as distressed by the State of Oregon.

Cities, counties and special services 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 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 communities across Oregon cannot afford to risk.

The DEQ budget package before the Natural Resources Subcommittee of the Ways and Means Committee includes a large amount of additional resources and staffing only in the Water Quality Permitting program. We are writing to support a more modest and balanced approach that includes providing resources to the important foundational programs. 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; the number of permits is not the only consideration, quality and implementability are also important. In addition, fee impacts to local, especially small, communities must be considered. The DEQ budget package would result in permit fee increases greater than 40% over the

biennium, which would be a substantial burden on our ratepayers and our communities. A more balanced approach should include several important elements:

- The 40% rate increase in the proposed budget is far too high for local communities and not sustainable by our customers;
- 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 astronomical--as high as 1000%--and were not balanced with any general fund support for the permitting program;
- Avoid overly centralizing DEQ, instead resuming support of hands-on involvement of regional staff in permitting; and
- Accountability for the agency.

Thank you for your attention to this matter. If you have any questions or require additional information, please do not hesitate to contact me at our administrative offices at 541.672.1551.

Sincerely,



James V. Baird

General Manager