



The League of Women Voters of Oregon is a 101-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.

March 31, 2021

To: [House Committee On Energy and Environment](#)
Rep. Pam Marsh, Chair
Rep. Ken Helm and Rep. David Brock Smith, Vice-Chairs
Members of the Subcommittee

Re: **HB 2241** – Requires DEQ to add Contractors to Permit Processing – **Oppose**

The League of Women Voters of Oregon has had strong positions on water quality and quantity since 1969. We studied these issues again in 2008-10: [Part One](#) and [Part Two](#). We are actively engaged in the water quality programs of the Dept. of Environmental Quality (DEQ) to assure the Clean Water Act is implemented. We served on the “Blue Ribbon Committee” and as a member of the stakeholders group helping to develop and advocate for the **2015 Budget Note** around finding solutions to wastewater permits. We followed up by participating with the contractor during their work. They have provided the department and this legislature with **a path to a solution** to this extremely important public health AND economic issue.

The department has taken those recommendations and has provided the legislature with a path to success. Each budget year the League advocates for investing in the improvements needed to get permits processed by providing technical assistance staff as well as additional permit writers to implement their new 10-year plan. The department has reorganized and has added some staff—within legislative budget constraints. It is important that permits be processed with appropriate data and under both EPA and DEQ rules and guidelines.

HB 2241 requires DEQ to approve at least three contractors to process wastewater permits under the Clean Water Act, which, by itself, seems innocuous. But, because DEQ is required to meet federal and state laws and rules, the department will still be responsible for reviewing the contractor work to assure it meets those laws and rules. Then DEQ is required to approve or disapprove the application within 30 days. This proposed process allows those with deep pockets to hire their own permit processors and would put them to the head of the line as DEQ permit processors would need to stop other permit work to address this timeline. The League would note that permit applicants include both public entities as well as private businesses. The concept of hiring contractors was a discussion in previous stakeholder meetings, but was not considered the most efficient way to move the work forward since permits are complicated and specific knowledge is needed to assure that the requirements under any permit are met.

It is our understanding that DEQ does put new permit applications ahead of permit renewals. And, as noted above, without full funding for this department, it is challenging to accomplish all that is asked of them. Having to review another’s work for federal and state consistency is yet another burden.

Thank you for the opportunity to discuss this legislation. **We ask that you NOT PASS this bill out of committee but instead help us advocate for full funding for DEQ’s Water Quality Division.**

Rebecca Gladstone
LWVOR President

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LWVOR Natural Resources Coordinator