



The League of Women Voters of Oregon, established in 1920, is a 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 2, 2023

To: **Chair Helm, Vice Chairs Hartman and Owens and Members of the Committee
House Committee on Agriculture, Land Use, Natural Resources, and Water**

Email: halnrw.exhibits@oregonlegislature.gov

Re: **HB 2238 - Authorizes Rulemaking to Establish New Removal/Fill Permit Fees -
SUPPORT**

The League of Women Voters of the United States believes that natural resources such as forests and the animals and plants living within them should be managed as interrelated parts of life-supporting ecosystems.

The League has strong positions on water quality. We particularly note that Oregon has a goal of no net loss of wetlands. Oregon recognizes the role of wetlands in water quality and in flood management among other values. The waters of the state are an important public asset. Management of activities in these waters must be done carefully and with full application of state and federal regulations.

From the League of Women Voters of Oregon water study: [Part 1: Regulating Water in Oregon](#): *Wetlands are considered “waters of the state” and are defined by soils, vegetation, and hydrology. Oregon, like the federal government, is committed to a goal of “no-net-loss” of wetlands. Mitigation is required if wetland loss is deemed unavoidable.*

On March 21, 2021, we submitted the following testimony on behalf of the Dept. of State Lands SB 5539 budget: ***We do encourage the agency to review its removal-fill permit application fees as that work is long overdue and fees need to be increased. A 2019 study indicated that fees are only covering about 20% of the cost of processing. The League supports a shared system as we also believe the public needs to be represented in the application process.***

On February 4, 2022, we submitted [comments](#) to the State Land Board in support of what is now **HB 2238**: *Implementing a sustainable fee structure for the Aquatic Resource Management Program to eliminate the fiscal burden on the Common School Fund. We recognize that there will be pushback from those required to pay the fees. We are willing to work with others to find a way to balance the needs of those who require these permits (which protect Oregon’s waters of the state, including wetlands) with the need to acknowledge the burden on the Common School Fund.*

However, these waters are a multi-generational asset as is the Fund. We look to the department to include Oregon's tribal members and underserved communities who may be affected by flooding and other harmful consequences due to lack of appropriate regulation. We also recognize the opportunities to store "blue carbon" in these areas. Of course, these waters are also the home to a variety of threatened and endangered species, including Oregon's iconic salmon.

Although we didn't see a bill in the 2022 session when we submitted the above comments to the State Land Board, we are pleased to see a bill this session. **Now is the time to pass HB 2238. We urge your support for this bill.**

Thank you for the opportunity to discuss this legislation.



Rebecca Gladstone
President LWVOR



Peggy Lynch
Natural Resources Coordinator