



DATE: April 11, 2025

TO: Joint Committee on Ways & Means Subcommittee on Natural Resources

FROM: Wild Salmon Center

RE: Priorities for Funding in 2025-2027 Oregon Department of Environmental Quality Budget (SB 5520)

Dear Co-Chair Frederick, Co-Chair Levy, and Members of the Committee:

Thank you for the opportunity to provide comments on the Oregon Department of Environmental Quality's (DEQ) budget under SB 5520. Wild Salmon Center is a nonprofit organization based in Oregon that works with local partners to protect and restore healthy forests and abundant safe, clean water to support the strongest remaining runs of wild Pacific salmon. We use science to drive policy, lead planning processes, and support implementation of durable conservation protections.

Oregon's supplies of reliable, safe, clean water are under threat from drought, declining river health, and competing water needs. This biennium will be critical to maintain funding levels for natural resource agencies and invest in projects and strategies that support a climate-resilient Oregon.

Wild Salmon Center respectfully requests your consideration of the following priorities for DEQ's budget under SB 5520:

- Fully fund Policy Option Package (POP) 170 "Address Critical Resource Gaps" for DEQ's Water Quality Program (\$3.3M GF, not funded in GRB):

POP 170 includes critical funding to support capacity for Clean Water Plans, or Total Maximum Daily Loads (TMDLs) and for the Integrated Water Resources Strategy (IWRS). Both issue areas represent significant needs for the state that have been chronically underfunded, and eliminating this funding puts interagency efforts and the state's ability to meet court-ordered deadlines at risk.

- 1) Funding to support implementation of TMDLs to meet court-ordered deadlines:

POP 170 includes funding for 4 positions to increase technical capacity and support for development and implementation of Clean Water Plans, also known as Total Maximum Daily Loads (TMDLs). Oregon has already fallen behind the court-ordered schedule to update and replace its temperature TMDLs and was recently granted an 18-month extension on

remaining TMDLs in March 2025.¹ As stated in DEQ’s ARB, “without additional funding, DEQ is at-risk for missing court-ordered TMDL issuance timelines, and there will be limited capacity to support designated management agencies and others affected by TMDL issuance.”² Continuing to underfund this program increases the risks of future litigation and non-compliance with court-ordered deadlines. This also extends the time under which a significant number of the state’s existing temperature TMDLs continue to use a temperature standard disapproved by the U.S. Environmental Protection Agency (USEPA) that puts clean, safe drinking water for people and fish at risk.

2) Funding to support DEQ’s role in Oregon’s Integrated Water Resources Strategy (IWRs):

POP 170 also reclassifies two existing NRS3 positions approved in the 2023-2025 biennium and adds a new coordinator (NRS4) position to support DEQ’s efforts in the IWRs process. This plan provides a framework to address in-stream and out-of-stream water needs across state agencies, and the most recent draft was released in April 2025.³

Directly related to the clean water priorities under POP 170 above, we are significantly concerned about proposed reductions for DEQ’s Water Quality Program in the Governor’s Recommended Budget (GRB). We do not support the following proposed reductions identified in DEQ’s 2025 Supplemental Materials for Ways & Means:

1. Priority #6: Water Quality - Permitting: Proposes a \$1.5M GF reduction that would eliminate 3 water quality permit writing positions and 1 stormwater compliance specialist position, cutting the program staff capacity for all NPDES permits at DEQ by 30%. Reducing permit writing staff would significantly impair the agency’s ability to address the substantial backlog of NPDES permits that it is required to address and update following a 2018 settlement agreement. Under Key Performance Measure (KPM) 8, DEQ has made progress in addressing this backlog and reduced the NPDES individual permit backlog by 23% in 2024.⁴ Not only would these funding cuts lengthen the time that dischargers may operate under outdated or expired permits, but would put the state at risk of not meeting the terms of the settlement agreement. As stated by DEQ, “Without these positions, DEQ’s settlement agreement will be jeopardized...”⁵
2. Water Quality - Clean Water Plans: Proposes a \$1.4M GF reduction that would eliminate 4 NRS positions that support efforts to address nonpoint source pollution that typically occurs from polluted runoff from roads, parking lots, farm fields, or construction sites. Addressing nonpoint source pollution is integral to the development and implementation of TMDLs. As stated by DEQ, “This reduction would severely limit DEQ’s ability to develop and implement Clean

¹ Oregon DEQ, Temperature TMDL Replacement Project, <https://www.oregon.gov/deq/wq/tmdls/Pages/tmdlreplacement.aspx>

² Oregon Department of Environmental Quality Agency Request Budget (ARB), August 2024, p. 283.

³ Oregon’s Integrated Water Resources Strategy, Oregon Water Resources Department, <https://www.oregon.gov/owrd/programs/planning/iwrs/pages/default.aspx>.

⁴ Oregon Department of Environmental Quality, 2025 Supplemental Materials for Ways & Means, p. 64.

⁵ DEQ, 2025 Supplemental Materials for Ways & Means, p. 39.

Water Plans (i.e. TMDLs) for impaired waters across the state.”⁶ The agency cautions that these funding cuts will “stop investigation and follow up of NPS pollution complaints” and reduce DEQ’s ability to comply with the Clean Water Act.⁷

3. Water Quality - Integrated Water Resource Strategy: Proposes a \$566,000 GF cut to eliminate 2 positions that support IWRS coordination. DEQ states that “Without these positions, DEQ’s capacity to review water rights applications will be severely limited, as will the ability to participate in watershed place-based planning efforts.”⁸ These cuts risk undermining current Legislative efforts to reduce the water right transaction processing backlog at OWRD, as well as hampering the efforts of local communities to plan for and improve their water future.
4. Water Quality - Data Stewardship: Proposes a \$282,000 GF cut to eliminate 1 position that supports water quality lab data and coordination with the TMDL program. This would delay the timeline for data in TMDL development and “this data would not be accessible to the public through the agency public facing water quality database, AWQMS.”⁹

We respectfully request that you fully fund POP 170 for the Water Quality Program and that you do not move forward with proposed reductions for the water quality programs and staff listed above.

Thank you for the opportunity to provide more detailed comments regarding the DEQ budget bill (SB 5520), and please contact us if we can provide further information as you consider these critical funding needs.

Sincerely,

Stacey Detwiler
Oregon Policy Director
Wild Salmon Center

⁶ DEQ, 2025 Supplemental Materials for Ways & Means, p. 40.

⁷ DEQ, 2025 Supplemental Materials for Ways & Means, p. 40.

⁸ DEQ, 2025 Supplemental Materials for Ways & Means, p. 41.

⁹ DEQ, 2025 Supplemental Materials for Ways & Means, p. 42.