



The League of Women Voters of Oregon is a 100-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.

February 28, 2020

To: Dan DeFehr, Rulemaking Contact
Department of Environmental Quality
ACDPFees2020@deq.state.or.us

Re: Air Contaminant Discharge Permit Fee Increase 2020 - SUPPORT

Since 1968, LWVOR has been a voice on behalf of air quality. In more specific terms, the League supports adequate standards for control of all sources of pollution and strict enforcement of established rules and regulations, a comprehensive, coordinated program for management of air as a natural resource, and adequate financing for air pollution abatement programs.

The DEQ's proposed ACDP fee increases will achieve the 70% increases approved in the 2019 legislative session. These increases will fund the six new permit writing positions that are critical to address the permitting backlog. Creating a new category for Basic Air Contaminant Discharge permits will simplify the process and make it more efficient for relatively simple sources that are already subject to permitting.

Businesses have been enjoying a period of an underfunded ACDP program. Now, as the ACDP program comes more into line with the true costs of doing business, every effort has been made to include stakeholders in the process of raising the approved revenue in the most equitable way. These proposed fee increases have been carefully crafted to soften the impacts on small businesses.

LWVOR supports these fee changes. We hope that this smooths the way to properly fund the ACDP program with more moderate and more frequent increases going forward.

Thank you for the opportunity to discuss this issue.

A handwritten signature in black ink that reads "Rebecca L. Gladstone".

Rebecca Gladstone
LWVOR President

A handwritten signature in black ink that reads "Susan Mates".

Susan Mates
Air Quality Portfolio