



### VOTE NO ON HB 2250

Oregon is a leader in environmental protection. To that end, policy makers have introduced HB 2250 which would require Oregon’s natural resources agencies to compare any changes to federal regulations under the Clean Water Act, Clean Air Act or Safe Drinking Water Act to “baseline” standards, which are defined as standards in place on the last day of the Obama Administration. If the natural resource agencies find the changed regulations are less protective of public health than the prior regulations, the agencies are directed to effectively find a path to keep implementing the prior regulations. Presumably, this is to avoid environmental regulatory “roll-backs” anticipated under the Trump administration. While this may make for good political theater, it makes for bad policy.

- The proposed analysis would consume vast agency resources and would be inordinately time consuming for Oregon agencies that are already behind in their core functions. For example, Oregon’s Department of Environmental Quality is already significant behind in issuing permits, developing total maximum daily loads, and is already mired in litigation over almost any action it takes. To have its staff take time away from these core functions to assess every change to federal regulations would set the agency even further behind in meeting its core functions. The resources required to complete an analysis of this magnitude would be better spent on the ground improving Oregon’s environment.
- Many federal programs address issues that are handled in very different ways under state law and contain very different jurisdictional triggers. For example, Oregon’s fill and removal laws contain different exemptions and jurisdictional triggers than the Clean Water Act, adding additional complexity to the analysis. Reconciling these programs whenever a federal regulation changes and making the state regulatory regimes similar to the 2017 regulations would be difficult and threatens to prompt significant litigation.
- Oregon’s laws should be driven by science, not politics. To the degree that any state program does not sufficiently protect the environment, then Oregon lawmakers should enact affirmative law requiring additional protection. Indeed, this is how Oregon has already operated, with our programs already going well above what’s required by federal law. Federal regulations, under fundamentally different statutory regimes, do not make a good proxy for environmental protection when Oregon has always charted its own course.

The undersigned urge you to **vote no on HB 2250** because it is an unwise, expensive, and altogether unnecessary policy for Oregon.

Oregon Farm Bureau  
Oregon Business & Industry  
Oregon Metals Industry Council  
Oregon Homebuilders Association  
Oregon State Chambers of Commerce  
Oregon Forest & Industries Council  
Oregon Concrete & Aggregate Producers Association  
Oregonians for Food & Shelter  
Oregon Cattlemen's Association  
Oregon Seed Council  
Oregon Women for Agriculture  
Oregon Dairy Farmers Association  
Oregon Association of Nurseries  
Food Northwest  
Oregon Small Woodlands Association  
Associated Oregon Loggers, Inc.  
Oregon Wheatgrowers League

Contact: Mary Anne Cooper, [maryanne@oregonfb.org](mailto:maryanne@oregonfb.org)