



March 12, 2021

To House Committee on Water
From: Oregon Association of Conservation Districts
Re: Concern with HB 3228 – Water Management Plans

Chair Helm and Committee Members,

The Oregon Association of Conservation Districts (OACD) has concerns with **HB 3228** as written. OACD represents Oregon's 45 Soil and Water Conservation Districts, which are special districts governed by countywide elected boards. The Districts protect and enhance soil quality, water quality and quantity, and habitat by supporting voluntary conservation in partnership with private landowners and managers as well as federal, state, and nonprofit partners.

Our concerns are outlined below, and we would recommend that a work group be established in coordination with the Water Resources Department. An alternative would be to have a pilot project if the legislature funds support for the pilot.

These are the issues we see:

- More definition is required on the transaction process
- Major cost and staff time to implement on a statewide basis if allowed to be used in any basin with 180 days' notice
- Considerable oversight required by the department with no funding support
- Recordkeeping of rights within the plan not identified
- Limitation of oversight of the department if a right of record is within the plan

Having said that, there could be a way to do this effectively, but more work is required before a statewide launch. The Deschutes Basin has a plan developed under statute, but it is quite rigorous, and I believe funding was allocated for the department to be able to enact it.

We are concerned with the Harney Basin conditions and we would like to see a tool that can be developed, perhaps as a pilot, but with more provisions than outlined, developed in cooperation with the Water Resources Department.

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