

Submitter: Pat Gaylord
On Behalf Of: PLSO Director to NSPS
Committee: Senate Committee On Natural Resources
Measure: HB3187

Thank you for the opportunity to provide this testimony,

The proposals included in this bill for the convenience of not having to hire outside professionals, as claimed by some supporting testimony, quite simply does not protect the citizens of Oregon nor its natural resources. It is also an attack on professional licensure requirements which is now regularly happening nationwide. Professional licensure has a long history in the United States for a reason. The knowledge required is advanced in nature, practiced of a long period of time and often requires advanced education in addition to experience. Misuse or misapplication of that knowledge, or the lack thereof, can result in irreparable harm to individuals or the public.

Many elements of the Certified Water Rights Examiner Certificate require land surveying knowledge which the current law recognizes. This includes knowledge of land records research, identification of land boundary monuments and public land corners, understanding of measurements, accurate area computations and coordinate systems, proper use of GIS systems for accurate data, and preparation of accurate maps and legal descriptions. Improper determination of any of these items is damages the public and introduces uncertainty into our land and water records system.

The current proposal of seven (7) years of work experience does not measure up to the knowledge and rigor required of those who have obtained licenses in land surveying, engineering or geology. Land Surveyor, Engineer and Geologist all have detailed definitions under Oregon Statute which qualify them and for which they are regulated. The current proposal is open ended and undefined in many ways.

- What work experience is considered relevant?
- How will "relevant technical experience" be documented to qualify employees for an exam?
- After obtaining a CWRE, is their work limited to "in house" work for a district or can they solicit services to the public?
- What if they are no longer employed at a district after obtaining the CWRE certificate?
- Will they be subject to continuing education requirements the same as others holding the CWRE certificate and licensed under their respective professions?
- If performing surveying related work, such as identifying public land corners and performing measurements to them, as part of the water rights process will they

be exempt from
surveying related laws?

None of the above items are considered or addressed in any way by the current bill text. If it was to proceed forward these items should be addressed.

On behalf of the Professional Land Surveyors of Oregon and as their Director to the National Society of Professional Surveyors, I strongly oppose this legislation and hope you will do the same. Professional licensure requirements included in the current law protects the public and ensures that proper surveying related knowledge is included in the CWRE process.

Respectfully submitted,
Pat Gaylord, PLS (OR, WA, ID)