

TUMALO IRRIGATION DISTRICT

February 24, 2025

Senate Committee on Natural Resources and Wildlife

Written Testimony on Senate Bill 427

Chair Golden, Vice-Chair Nash, Senator Girod, Senator Prozanski, Senator Taylor:

I am writing to express Tumalo Irrigation District's strong opposition to Senate bill 427. Tumalo Irrigation District is in Central Oregon and provides agricultural water to over 7400 acres of land and has 700 patron farmers. The current water rights transfer process provides TID with sufficient flexibility to ensure that the water is being used where intended and allows landowners to make changes to their infrastructure to improve efficiencies on their irrigated lands. Senate Bill 427 would add an overly burdensome and unnecessary new transfer standard that will directly and negatively impact the ability of Tumalo Irrigation District to manage water efficiently and effectively within our District boundaries.

Tumalo Irrigation District recognizes that all surface water rights in the Deschutes Basin are fully appropriated. This condition means that new surface water rights are nearly impossible to secure within the Basin. Tumalo Irrigation District and our patrons use the current water rights transfer process to help ensure the beneficial use of water and efficient management of on-farm water use within the district. Currently, OWRD will not approve a transfer if the transfer enlarges or expands the existing water right in any way or can cause injury to *any* other existing water right. If applied correctly, the current injury standard ensures that existing water rights will be protected, including instream water rights.

Senate Bill 427 proposes a new standard that requires OWRD to determine if a transfer would result in the "diminishment of streamflow." If implemented, this new standard would lead to extensive analysis by OWRD staff that has the potential to dramatically increase the already long delays in the transfer process that can continue for years. Senate Bill 427 also includes additional provisions for instream stakeholders to protest even simple transfers which have the potential to completely stop the transfer process or make it so expensive that it will be nearly impossible for a district and farmers such as ours to use the water rights transfer process to increase on-farm efficiency.

In closing, Tumalo Irrigation District encourages you to vote against Senate Bill 427, as we look forward to continued engagement in conversations on how to further improve the efficiency of Oregon's current water right transfer process for the benefit of the communities, agriculture and the environment.

Sincerely,

Chris Schull
District Manager/ Secretary of the Board
Tumalo Irrigation District

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