



League of Oregon Cities

March 12, 2025

House Committee On Agriculture
Land Use, Natural Resources, and Water
900 Court St. NE
Salem Oregon 97301

RE: Opposing Specific Sections of HB 3342 “dash-one” Amendment

Co-Chairs Helm & Owens, Vice Chair McDonald, and Committee Members:

On behalf of the League of Oregon Cities, representing all 241 cities across the state, we are writing to express our opposition to House Bill 3342 as currently drafted. While we recognize that several provisions in the bill seek to simplify and improve the Oregon Water Resources Department’s (OWRD) application processes, other sections raise significant concerns that could limit water infrastructure resilience and impact municipalities' ability to manage critical water resources.

One major concern is the proposed **Initial Review and Proposed Final Order process** for transfer applications. The bill requires applicants to respond to OWRD within 30 days of receiving an Initial Review or risk having their application file closed without recourse. While we appreciate the intent to streamline processes, this rigid deadline does not account for circumstances where additional time is necessary to respond. We urge the inclusion of a mechanism to allow applicants to request an extension or re-open their file when justified.

Further, the **permit amendment and transfer limitations** in HB 3342 pose challenges for municipal drinking water providers. The restrictions on moving a point of appropriation (POA) within designated critical groundwater areas, withdrawn sources, or groundwater management areas may unnecessarily hinder efforts to build more resilient infrastructure. Many municipalities rely on well systems and may need to make minor adjustments to their infrastructure to ensure reliable water delivery. While we understand the intent to protect groundwater resources, this provision could have unintended consequences for cities already operating under these constraints.

Finally, **Sections 32 and 33** introduce new authority for OWRD to deny permit applications based on the location of the place of use within a groundwater management area. While we support responsible groundwater management, we have concerns about how this provision would be applied in practice. We request further clarification on how this standard would be implemented and whether current practices provide sufficient protection without requiring additional statutory changes.

We appreciate efforts to improve the efficiency and clarity of OWRD's permitting processes, and we remain open to discussions on refining certain sections of this bill. However, as drafted, HB 3342 presents significant concerns for municipalities seeking to manage and sustain critical water resources. We respectfully urge the committee to reconsider the provisions outlined above to ensure that local governments retain the flexibility necessary to meet the water needs of Oregonians.

Many thanks,

Michael Martin
League of Oregon Cities