

Submitter: Rachel Freed
On Behalf Of:
Committee: Senate Committee On Natural Resources and
Wildfire
Measure, Appointment or Topic: SB1153

I am writing to formally express my opposition to SB 1153, which directs the Water Resources Department to evaluate whether certain water right transfers will negatively impact in-stream habitats for sensitive, threatened, or endangered aquatic species in unprotected stream reaches or contribute to water quality impairments in already limited streams. While I recognize the importance of protecting aquatic ecosystems, I believe this legislation poses significant challenges that warrant reconsideration.

First, the proposed requirements could create substantial delays and complications in the water rights transfer process. The additional evaluations required under this bill may lead to a backlog in water right applications, ultimately hindering responsible water management and potentially impacting agricultural and economic activities that depend on timely access to water. This could have far-reaching consequences for communities that rely on these resources for their livelihoods.

Secondly, the criteria for assessing the impact of water transfers on aquatic habitats and water quality are not clearly defined in the bill. The lack of specific guidelines may lead to inconsistent interpretations and implementation, resulting in uncertainty for water rights holders and potential legal disputes. This ambiguity could discourage investment and engagement in sustainable water practices, as stakeholders may be apprehensive about the risks associated with compliance.

Moreover, while it is essential to protect sensitive aquatic species, the bill does not adequately consider the existing frameworks and regulations already in place that address water quality and habitat protection. Many regions already have robust monitoring and management systems designed to safeguard these environments. Adding another layer of regulation could complicate existing efforts and lead to overlap without significantly improving outcomes for aquatic species.

Additionally, the focus on water right transfers may divert attention from other critical factors affecting aquatic habitats, such as land use practices, pollution from non-point sources, and climate change. A more comprehensive approach that addresses the broader range of threats to aquatic ecosystems would be more effective than narrowly focusing on water right transfers.

In conclusion, while I share the goal of protecting our aquatic resources and species, I believe that SB 1153 is not the right approach. I urge you to reconsider this

legislation and instead support initiatives that promote balanced water management practices, encourage collaboration among stakeholders, and prioritize existing protections for aquatic habitats.