



Public Works Service Area

City of Portland

Priya Dhanapal, Deputy City Administrator



ENVIRONMENTAL SERVICES

CITY OF PORTLAND

working for clean rivers



March 25, 2025

Senate Committee on Natural Resources and Wildfire

900 Court St. NE

Salem, OR 97301

RE: Opposition to Senate Bill 1153

Dear Chair Golden, Vice Chair Nash, and members of the committee:

On behalf of the City of Portland, I am writing to express our opposition to Senate Bill 1153, which directs the Oregon Water Resources Department (WRD) to consider new standards for water right transfers. While the City of Portland is committed to environmental protection, this bill as written will unreasonably impair municipal drinking water providers' and wastewater providers' use of water right transfers as a tool to address water quality issues, move a point of diversion for a treatment plant or improve resiliency when infrastructure improvements may be necessary.

As the public utility provider of clean drinking water and wastewater and stormwater management services in Portland, we are committed to stewarding our natural resources and built infrastructure responsibly, both for the environment and for our ratepayers. The City of Portland provides drinking water to nearly one quarter of all Oregonians, and are the stewards of two drinking water sources, the Bull Run Watershed and the Columbia South Shore Well Field. The City manages its water, wastewater, and stormwater to protect water quality, public health, and the environment and preserve public spaces and recreation.

The City of Portland complies with existing state and federal regulations such as the Safe Drinking Water Act and Clean Water Act, as well as Endangered Species Act consultation and other requirements required by the Environmental Protection Agency, National Marine Fisheries Service, Oregon Department of Environmental Quality, Oregon Health Authority, and Oregon Department of Fish and Wildlife. The City of Portland has invested significant resources in protecting water quality, public health, and the environment.

In Oregon, a transfer is the only mechanism to change an existing water right. As we head into a future where new water supplies are limited and water rights are increasingly more difficult to acquire, the water right transfer process serves as a critical administrative tool for municipal water providers to manage their existing water rights efficiently. Cities like Portland need flexibility in utilizing their water rights to successfully manage the critical water infrastructure needed to protect public health in the face of increasing uncertainty from climate change, natural disasters, and ever evolving drinking water requirements. For example, because surface waters and groundwater are hydraulically connected, Portland's ability to relocate a water supply well under an existing right in response to changes in aquifer conditions, land use or other factors could be impaired under the constraints of Senate Bill 1153.

We oppose Senate Bill 1153 as written and are open to language that would protect municipal interests in water rights transfers. We look forward to participating in future conversations about how to improve the efficiency of Oregon's transfer process for the benefit of Oregon's communities, economy, and environment.

Sincerely,

Priya Dhanapal
Deputy City Administrator
Public Works Service Area
City of Portland



Portlandgov



PortlandORGov



@PortlandGov