



## NAUMES, INC.

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March 27<sup>th</sup>, 2025

The Honorable Jeff Golden  
Chair, Senate Committee on Natural Resources and Wildfire  
900 Court St. NE,  
Salem, Oregon 97301

Chair Golden and members of the Senate Committee on Natural Resources and Wildfire:

Our family business, Naumes, Inc., is primarily a grower, packer and shipper of pears, farming around 1100 acres of orchards, and we also operate around 86 acres of wine grapes, Naumes Family Vineyards, and a custom crush winery, Naumes Crush & Fermentation. My family has been farming in Southern Oregon for three generations.

I am writing you today in regards to the proposed Senate Bill 1153. I appreciate the opportunity to comment on the significant challenges and dangers this bill represents to farming and agribusiness in Oregon. We urge you to oppose SB 1153. As you know, this bill would impose alterations to the water right transfer process that would decrease flexibility, increase the risk of litigation, and create unnecessary delays for agricultural producers.

What our industry needs now is stability and not fresh disruptions and burdensome regulation. Unfortunately, SB 1153 would add two new criteria to the already rigorous transfer evaluation process:

1. Whether a transfer might affect instream habitat for sensitive, threatened, or endangered aquatic species—even in reaches not protected by an existing water right;
2. Whether a transfer might contribute to water quality impairments in already listed streams.

The standards are vague and hand enormous discretionally power to agencies that are not currently involved in the water right transfer process. OWRD does not have the scientific expertise to evaluate these impacts and other agencies already have the authority to secure instream rights and address water quality concerns through existing law. Furthermore, it is already hard enough to get changes through the OWRD in a timely manner and adding more layers of bureaucracy will only compound the problem.

In practice, these new requirements will invite lengthy multi-agency reviews and open the floodgates to legal challenges from third-party opponents. For working farms, that means uncertainty, delay, and potentially losing access to water at the worst possible time. Agriculture relies on hitting very time sensitive crop windows and any disruption can be disastrous for operations.

Oregon farmers already face navigating a myriad of regulations from various agencies including new ground water rules from the OWRD that have just recently gone into effect. SB 1153 moves us in the wrong direction by adding more burdensome layers of bureaucracy instead of promoting much needed flexibility.

I urge you to listen to agricultural producers and vote “No” on SB 1153.

Thank you,

Michael D. Naumes  
President & CEO  
Naumes, Inc.

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