



To: House Committee on Agriculture, Land Use, Natural Resources, and Water  
From: Consolidated Oregon Indivisible Network (COIN)  
Re: Testimony in opposition to HB 3544 -3  
Date: April 4, 2025

**Co-Chair Helm, Co-Chair Owens, Vice Chair McDonald and members of the House Committee on Agriculture, Land Use, Natural Resources, and Water**

I am writing today on behalf of the Consolidated Oregon Indivisible Network (COIN) to express opposition to HB3544. COIN is a coalition of over 50 local Indivisible groups, spanning all regions of Oregon, that cooperate and amplify their efforts to advance federal and state legislation and engage with elected officials to promote progressive causes that benefits all Oregonians.

This bill proposes a broad array of procedure and process changes to the complex water rights transfer system, in an effort to balance efficiency and due process rights. This is a valiant effort and represents a great deal of thoughtful work on the part of WRD staff, and we support many features of the bill that would increase efficiency.

However, we have strong concerns around features of the bill that would make it more difficult for non-applicants representing public interests to file, prepare and present contested cases. This would be harmful to the public interest in management of Oregon's water resources.

The fact is not lost on us that there is some small, but nonetheless disturbing, overlap of HB3544 and HB3501, in that both base bills prohibit consideration of public interest in water rights transfer applications. This unsettling feature is the subject of some promising amendments in HB3544, in the sense that public interest can now be considered in contesting transfer applications. Nonetheless, at least two particular items in the -3 amendment continue to be problematic. Specifically:

- 1) The change in the wording "any person can file a protest" to only "a person adversely affected or aggrieved can file a protest", as this adds a potentially troublesome new layer of litigation to the process (which runs counter to the intent of the bill to simplify the system).
- 2) There are no objective criteria as to how exceptions to the (shortened) 180-day time frame for resolving contested cases will be granted or denied.

Oral and written testimony by representatives from Water Watch and the Wild Salmon Center articulated these (and several additional) concerns in more thorough detail. We

strongly encourage the Committee to take these reasonable directives into careful account in consideration of this bill.

Thank you for the opportunity to testify in opposition to this important legislation.

Respectfully,

Patricia Kramer, Portland  
on behalf of the Consolidated Oregon Indivisible Network  
[www.coinoregon.org](http://www.coinoregon.org)