



#### BOARD OF DIRECTORS

Tami Kerr, Chair  
Oregon Dairy Farmers Association  
April Snell, Vice-Chair  
Oregon Water Resources Congress  
Meghan Tuttle, Secretary-Treasurer  
Weyerhaeuser Company  
Kim Anderson  
Oregon State University  
Michelle Armstrong  
Wilbur-Ellis  
Angi Bailey  
Oregon Farm Bureau Federation  
Seth Barnes  
Oregon Forest & Industries Council  
Luke Bergey, Past Chair  
Miami Corporation  
Butch Bernhardt  
Western Wood Preservers Institute  
Loren Bumgardner  
West Coast Beet Seed Company  
Megan Chuinard  
Oregon Seed Council  
Ken Dey  
J.R. Simplot Company  
John Enright  
KWS Seeds  
George Gough  
Bayer U.S. - Crop Science  
Greg Harris  
Threemile Canyon Farms  
Amanda Hoey  
Oregon Wheat Growers League  
Bill Hoyt  
Oregon Cattlemen's Association  
John Jayne  
Cascade Timber Consulting  
Jill LeVake  
Corteva Agriscience  
Elin Miller  
Umpqua Vineyards  
J.P. Mischkot  
Glass Tree Care & Spray  
Colleen Nihen  
Associated Oregon Hazelnut Industries  
David Phipps  
OR Golf Course Superintendents  
Annette Price  
Pacific Power  
Jerry Risk  
Roseburg Forest Products  
Ben Sacher  
Syngenta  
Chris Sexton  
Lone Rock Timber Management Co  
Alec Shebiel  
Umatilla Electric Cooperative  
Craig Smith  
Far West Agribusiness Association  
Jeff Smith  
Valent USA  
Jake Thiemens  
Manulife Investment Management  
Larry Treleven  
Oregon Pest Control Association  
Paul Washburn  
Western Helicopter Services  
Laura Wilkeson  
Hampton Lumber  
Chuck Wolsborn  
Gresham Golf Course

## OREGONIANS FOR FOOD & SHELTER

1320 Capitol Street NE • Suite B-50 • Salem, Oregon 97301

ofsonline.org; 503-370-8092

A non-profit coalition to promote the efficient production of quality food and fiber while protecting human health, personal property and the environment, through the integrated, responsible use of pest management products, soil nutrients and biotechnology.

April 8, 2025

Senate Committee on Natural Resources and Wildfire

*Re: Opposition to SB 1154*

Chair Golden, Vice-Chair Nash, and Committee Members:

Thank you for the opportunity to share concerns with SB 1154 and the Governor's proposed changes to Oregon's groundwater protection statutes. OFS represents a diverse coalition with members from various industries within Oregon's natural resource sector. We advocate for science-based policy, innovation, and stewardship related to the tools and technologies essential for producing food and fiber: pesticides, fertilizers, and biotechnology. OFS and our members and partners are currently engaged in multiple ongoing discussions and rulemakings related to groundwater protection issues.

OFS is supportive of improvements to the GWMA process to ensure that our state agencies have both clarity and resources as they engage in the important work of addressing issues of groundwater concern. In fact, OFS and our partners have advocated for increased resources for DEQ's GWMA program many times over the last few biennia<sup>1</sup>, and we remain concerned with the lack of targeted investments on this issue. Our members live and work in these same communities and depend on clean water for the health of their families, animals, and crops.

Following multiple biennia of testimony on the subject, in 2022 OFS joined several partners on a formal letter to former DEQ Director Whitman asking for: 1) a meaningful and expanded monitoring program in GWMA's, 2) increased investment in the GWMA program, with adequate staff to support the work of existing and future GWMA's, and 3) increased coordination across agencies and within communities to ensure that the water our members rely on for their drinking and irrigation water remains safe, and that our members are able to continue to follow the best practices around fertilizer use on their farms and ranches. Again, we are very much aligned on these goals.

Given this, it is important to emphasize the pressing need for increased resource investments in agency capacity as a key missing component in the discussions around this bill as it relates to the groundwater designation process and program, and agency capacity and workloads. Targeted investment in state agency capacity to work and coordinate on groundwater issues remains a critical and unaddressed need by the state.

We understand that the stated intent is to clarify agency authorities and processes, however the bill appears to go much further than this, amending language related to agency authorities across six different agencies. The bill also creates new processes and responsibilities that will impact local community leadership and decision-making related to the development and implementation of local action plans. There simply has not been sufficient time for the discussions needed to understand the significance of the proposed changes across agencies, and the impacts these would have on agriculture and related operations in the state.



Further, it isn't entirely clear what problem this bill is trying to solve. If the bill is simply clarifying authorities rather than creating new authorities, we aren't sure why this requires changes to Oregon's groundwater protection statutes. But any such changes surely deserve a more robust stakeholder process than has been able to take place over the last few weeks.

We agree that changes are needed to the GWMA process. As part of this, we would like to see discussions around the operating principles that underpin the state's work on this issue. Specifically, there is a need for agencies to evolve and adapt their assumptions and opinions based on new peer-reviewed science. Our agencies also need to use real data rather than assumptions to understand contributions from modern agricultural practices and other sources. And, perhaps most importantly, the state needs to invest in established and effective methods for remediating legacy contamination. Lacking reference to any of these pressing needs, it is unclear what significant new results this bill would bring to the GWMA process or to broader groundwater protection goals.

OFS is not comfortable moving forward with this bill without more time for discussion. We ask you limit this bill to one that more simply and clearly focuses on roles and process, and we would be willing to participate in a discussion in the interim regarding the additional tools and directives included in the proposed bill, and why they are necessary.

Respectfully,

A handwritten signature in black ink, appearing to read "Katie Murray".

**Katie Murray**  
Executive Director

---

<sup>i</sup> 2021, OFS and OFB: <https://olis.oregonlegislature.gov/liz/2021R1/Downloads/PublicTestimonyDocument/24564>  
2017, OFB: <https://olis.oregonlegislature.gov/liz/2017R1/Downloads/CommitteeMeetingDocument/106579>