

Submitter:	Sarah Liljefelt
On Behalf Of:	Oregon Cattlemen's Association
Committee:	Senate Committee On Natural Resources and Wildfire
Measure, Appointment or Topic:	SB1154

April 8, 2025

Chair Golden, Vice Chair Nash, and Members of the Committee:

This testimony is being submitted in lieu of oral testimony, given the time constraints at the April 8, 2025 public hearing. Below is the statement I would have provided at the hearing if I was permitted to testify during the public hearing:

For the record, my name is Sarah Liljefelt. I'm here today on behalf of the Oregon Cattlemen's Association as its Water Resources Committee Chair.

OCA represents the interests of ranchers throughout the State of Oregon, and many of its members rely on groundwater from private wells for domestic water supply.

OCA appreciates the serious consideration that is being brought to groundwater quality in the State. However, we ultimately believe that this bill needs more work before it is ready for enactment. We are certainly willing to continue working on the problem areas of the bill while promoting the overarching goals, so I'm encouraged to hear that additional amendments will be forthcoming.

Given the time limits, I will just make 3 quick points:

First, it is important to OCA's members that the State maintain the Oregon Department of Agriculture's implementation of the nonpoint source program for agriculture in the State. That program has been successful, and the bill threatens to impair that existing framework.

Second, it is important to give point-source permittees certainty in their permitting. Such permits are issued in consideration of water quality concerns, and to prevent water quality impairment. The bill would allow water quality permits to be reconsidered and modified without any due process proceedings for permit holders, which will create the potential for substantial uncertainty and expense related to these permits.

Third, you have already heard that many have concerns regarding the broad authority being granted to state agencies. I thought I'd give a couple examples:

- The bill includes a large number of provisions related to the Oregon Water Resources Department that just don't make sense and will require rethinking. OWRD is a water quantity agency, and doesn't have expertise to make decisions based on water quality – OWRD can certainly take DEQ's recommendations related to water quality into account in its decision-making (and it already does), but this bill goes much further and would require OWRD to start, for the first time, making water quality decisions in addition to the water quantity decisions it already makes. OWRD is already struggling to meet its existing core functions, and the requirement to start making water quality decisions will make that shortcoming much worse.
- The bill proposes to allow new, concentrated community water systems

without full consideration of impacts to existing users and water sources, and proposes to allow OWRD to withdraw water sources from appropriation without following the standard processes for such withdrawals. These proposed changes to water rights seem not fully baked, and many of the provisions are confusing and/or conflict with existing authorities.

Thank you for your consideration of these issues. OCA looks forward to continuing to engage on these and additional issues raised by the bill.

Sincerely,

Sarah Liljefelt, OCA Water Committee Chair