



Subject: Testimony in Opposition to SB 1153-3

Dear Chair Jama and Members of the Senate Committee on Rules,

Ochoco Irrigation District is located in the Heart of Oregon in Crook County. We provide water to over 20,000 irrigated acres and nearly 900 patrons. The District owns Ochoco Reservoir and operates Prineville Reservoir under contract with the US Bureau of Reclamation. We are writing to oppose SB 1153-3 as proposed.

This bill would create new standards for how existing water rates are evaluated for transfers and places additional responsibilities on OWRD to make those evaluations on two new criteria. This will entail an extensive and time-consuming analysis that will further slow the already challenged transfer process. The current transfer process is prone to significant delays and this bill would make the transfer process nearly impossible to use moving forward. As a result, water users like OID will be unable to use this tool as a way to effectively manage the valuable resource we are trusted with.

Additionally, this bill was seemingly created without any advanced notice or input from water users or managers. It disregards the fact that state agencies currently already have the authority to provide information to OWRD and place conditions on water rights transfers as needed. The Department of Fish and Wildlife, Department of State Lands, Department of Environmental Quality, and others are included in that list of agencies. This bill would expose all transfers, big or small, to protests by unrelated parties. This will lead to even more delays and potential litigation. The Water Resources Department doesn't have the resources to keep up with its current level of legal expenses much less these potential increases.

Furthermore, proposed amendments target specific groups and exempts others with the same or similar water rights. The confusion and inequality created by these preferences will further complicate the expectations for OWRD.

Finally, this bill just doesn't make sense. The legislature needs to focus on ensuring that water users have the tools necessary to manage water through enhanced water right flexibilities that lead to increased operational efficiencies. This includes instream water rights that would be seriously limited by this bill. Encumbering the Water Resources Department with unnecessary burdens will cause the system to grind to a halt and result in less efficient water management.

This excessively broad and complex bill would disincentivize efficient and innovative water management for groups like ours. Increasing costs, delayed processes and uncertainty

with how OWRD will conduct reviews will undoubtedly result in less efficient use of Oregon's water resources.

Please vote no on SB 1153-3.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce Scanlon". The signature is fluid and cursive, with a long horizontal stroke at the end.

Bruce Scanlon
Manager, Ochoco Irrigation District