Central Oregon Cities Organization

Bend, Culver, La Pine, Madras, Maupin
Metolius, Prineville, Redmond, Sisters

March 19, 2019

Dear Chair Riley and members of the Senate Committee on Business and General Government,

The Central Oregon Cities Organization (COCO), a group of 9 Central Oregon Cities in Central Oregon that work collaboratively on long term water supply issues, oppose SB935 for the following reasons:

Senate bill 935 is unnecessary because there is already a limited license option (OAR 808-003-0035) which just took effect February 1, 2019. OAR 808-003-0035 is the result of the collaborative work of the Landscape Contractors Board, the Governor's office, League of Oregon Cities, trade association representatives, and the Regional Water Providers Consortium to reduce the barriers of entry into the landscape construction profession in Oregon by creating a modified or limited licensure option. To protect and conserve Oregon's drinking water resources, OAR 808-003-0035 does not permit the design and/or installation of irrigation systems. In contrast, SB 935 would permit the design and installation of residential irrigation systems (four or fewer zones) by contractors with modified licenses without requiring the experience or demonstrable competency needed to design or install such irrigation systems.

Irrigation systems of all sizes require experience and technical knowledge in order to be properly designed and installed. Landscape construction professionals play an integral role in assisting water providers with managing the state's precious water resources. Water use is at its highest during the summer due in large part to irrigation. Improperly designed and/or installed irrigation systems can result in substantial leaks, inefficient water use, and backflow of water from the irrigation system into the drinking water system. Requiring those who have licenses to demonstrate their experience and technical knowledge of irrigation principles and best management practices helps to ensure that the water used for irrigation is used efficiently and safeguards the drinking water supply. By adding irrigation design and installation to the scope of limited licensure without requiring individuals to demonstrate their experience and knowledge of irrigation principles, SB 935 diminishes effective management of drinking water resources, as well as consumer and public health protections.

SB 935 sends a mixed message. Current law requires most municipal water providers to complete and implement comprehensive Water Management & Conservation Plans (WMCP) as a condition of their water right. Providing training and technical assistance for landscape professionals on water efficiency is a way for water providers to meet the requirements of their plans (OAR 690-086-0150). This training and partnership is critical to managing peak summer water demand when water supplies are at their lowest. Seasonal landscape irrigation can increase potable water consumption by as much as 60 percent, often times higher in Central Oregon.

Environmental regulations, water policies, irrigation technology, and landscape practices continue to evolve rapidly. **The citizens and communities of Central Oregon and throughout the state of Oregon are better served by an experienced and knowledgeable base of qualified, licensed landscape construction professionals for projects that require irrigation systems.** Therefore, we urge you to oppose SB935 and continue to support the sound stewardship of Oregon's drinking water resources and the collaborative work already accomplished by the recent adoption of OAR 808-003-0035.

Thank you for your consideration. If you have any questions, please contact COCO lobbyist Doug Riggs at 503-702-5120.

Respectfully,

Mayor George Endicott
Chair, Central Oregon Cities

cc: Senate Committee on Business and General Government
Regional Water Providers Consortium Technical Committee
Regional Water Providers Consortium Board
Oregon Water Utility Council
League of Oregon Cities
Special Districts Association of Oregon

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