

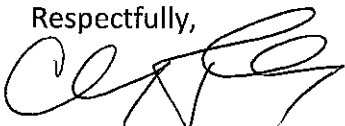
Honorable Representatives of the State of Oregon,

The passage of this bill would result in a minor change to the current statute but would have a major impact on the efficiency of Districts ability to process transfers for their patrons, farmers, and ranchers. Currently it is difficult to find and schedule a CWRE to process transfer applications for districts. This is a particular challenge in the more rural areas of the state which incidentally is where many irrigation district acres are held within the state of Oregon. District employees are currently given a level of trust that is comparable to the trust given to CWREs to process certain transfers. This level of trust is results from the product produced by district staff for these transfers are held to the same mapping standards and Oregon Water Resource Department (OWRD) approvals as others processed by CWREs. The passage of this bill would not remove the OWRD processes and requirements thus making them just as scrutinized as others that may be submitted by individuals currently eligible for CWREs testing. The passage of this bill still has Oregon State Board of Examiners for Engineering and Land Surveying (OSBEELS) as the regulatory authority for the CWRE certification meaning any district employee receiving their CWRE would be subject to the same ethical standard as the other CWRE.

Currently, to take the examination a person must be a registered geologist, surveyor, or engineer. Which presumably means you are working in some way with the waters of Oregon in your professional life and theretofore have an interest in becoming a CWRE. However, experience working in water or any specific training in water rights, in any way, is not a requirement for these professionals. Just their status as a registered professional under OSBEELS and their ability to pass the examination. That means that is conceivable that a person working at a district in a capacity to learn water rights and transfers could be more knowledgeable than one of the professionals registered as required in current statute. Now then if it is the case that adequate knowledge and training for this test and resultant job function(s) could be acquired though on the job training (OJT) without these specific professional registrations, effectively college degrees, then who or what is the current statute protecting; the people of the state of Oregon and/or their water rights? Or is it protecting people of affluence, education, and pedigree?

In fact, passage of this bill will not remove any the authorities held by OWRD or Oregon State Board of Examiners for Engineering and Land Surveying (OSBEELS) because the district employees and their products would be subject to the same standards. The only thing that this bill removes is the need for specific degrees to qualify to take an examination. The knowledge needed for this examination and the accompanying responsibility can be obtained through work experience just as meaningfully, if not more so, as a district employee who is engaged with this work on a day-in and day-out basis.

Respectfully,



Clancy Flynn