

HARTT Laura A * WRD

From: Casey McClellan <mccllellancasey@yahoo.com>
Sent: Friday, May 17, 2024 9:42 AM
To: WRD_DL_rule-coordinator
Subject: Division 8,9,410 comments

I am Casey McClellan, a Umatilla County, Walla Walla Basin agribusinessman and a user of deep basalt, alluvial, and surface water rights in the basin over that last 35 years.

I served on the RAC concerning this rule making, on behalf of the Oregon Winegrower Association and Seven Hills Winery.

Overall, I think the OWRD/OWC has done a great job with this rule making and fulfilling the mission of a more sustainable and equitable Oregon water resource into the future. It would be a shame for these rules to get significantly diluted in their power to change our water future.

I have just a few comments of concern:

1. Div 8, 0001(9)(a)(B): I would hope these “reasonably stable” parameters are as least as robust. as they were in the November version of this clause . I believe that weakening these are a blow against sustainability.

2. Div 8 0001(9)(d): I am opposed to basin specific rules that weaken the State’s overall mission to enhance sustainability, and believe this opens to the door to endless “unique” variations of the rules and would add substantial burden to the OWRDs’ work load. If basin specific rules are allowed their should be absolute best science based reasoning to support the need to for specific rules for that basin. It should NOT be easy to attain sin specific rules

3. I believe that Div 410-00702(b) in its relation to exempt wells risks significant political controversy, and could lead to very real legal actions, as it in effect will prohibit development in our dry-side Eastern Oregon rural areas. See Washington’s similar attempt a few years ago.

4. I think ti would be prudent that the OWC, OWRD and Legislature absolutely commit to substantially increase the staff numbers to deal in a real effective way with water right applications in a timely manner. This is very important for Oregon businesses.

I think the OWC and OWRD for the opportunity to comment and found your process to be very well executed. It was a privilege to serve on this RAC.

Sincerely,

Casey McClellan
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