



BOARD OF COUNTY COMMISSIONERS

PUBLIC SERVICES BUILDING

2051 KAEN ROAD | OREGON CITY, OR 97045

June 10, 2024

Ms. Laura Hartt
Water Policy Analyst
Oregon Water Resources Department
725 Summer St NE, Suite A
Salem, OR 97301

Re: Groundwater Allocation Rulemaking Public Comment

VIA EMAIL

Dear Ms. Hartt:

On behalf of Clackamas County, we submit for your consideration this public comment regarding the Oregon Water Resources Department's Groundwater Allocation rulemaking proposal.

While Clackamas County has no direct jurisdiction on groundwater allocation, we do recognize the proposals under consideration will affect both state and local goals for increasing housing production and improving access and livability for rural communities. Water needs vary across the state, and even across individual counties. A statewide approach may not adequately address the needs and challenges of specific regions, and could lead to inequitable distribution and utilization of ground water.

Moreover, agriculture, nurseries and green houses are one of Clackamas County's key business clusters. Water rights and allocations are closely linked to maintaining this important part of our economic landscape. We see and hear annually that cost of entry remains a barrier to growing small and medium sized farms and farm-ownership. Additional restrictions and barriers, however well intended, need to be married with solutions that are actionable and funded. The proposed rules state strongly that "investments and innovations" will be required for growth and "changing water realities." However, many rules that require investments often go unfunded. At a time when local governments are addressing multiple unfunded mandates, we suggest there should be further thought given to how the state will support local communities with these innovations and initiatives, especially as we strive to meet housing production goals and support rural economic growth.

We request the Department take a second look at how other states with climates similar to Oregon's conduct their evaluations, and to consider the shared goals listed here that the state and local governments are daily working to address.

Sincerely,

A handwritten signature in blue ink that reads "Tootie Smith". The signature is written in a cursive, flowing style.

Tootie Smith, Chair
Clackamas County Board of Commissioners