



Josephine County, Oregon

John West, Herman E. Baertschiger Jr. and Daniel E. DeYoung

Board of Commissioners' Office
500 NW 6th Street, Dept 6
Grants Pass, OR 97526
(541) 474-5221 #2

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Received

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OWRD

Ms. Laura Hartt
Water Policy Analyst/Rules Coordinator, Policy Section
Oregon Water Resources Department
725 Summer Street NE, Suite A
Salem, OR 97301

RE: Comments Regarding Proposed Groundwater Allocation Rulemaking

Dear Ms. Hartt and the Rules Advisory Committee:

We would like to provide comments to the Oregon Water Resources Department (OWRD) and its Rules Advisory Committee (RAC) in response to the ongoing process to develop proposed rules on groundwater allocation. Because groundwater is a vital resource in Josephine County, the proposed rules have the potential to impact the use of groundwater for the existing development of citizens in our County, as well as our future development and growth. Thus, we have a vested interest in these proposed rules and the process being used to develop those rules.

The one-size-fits-all rule does not consider the significant difference between the various basins within the State. Additionally, the proposed rules will likely result in a de facto moratorium on new groundwater use in areas where there is not a strain on groundwater. Our concerns include those sections of the rules that are aimed at determining when a new proposed groundwater use will "substantially interfere" with surface water sources. The proposed rules will result in the denial of a large majority of new permit applications, even when groundwater may be available for development, which will impact the citizens of our County.

We, the Josephine County Board of Commissioners, request that you pause the rulemaking process to allow for additional time to develop more scientifically based methods for evaluating interference with surface water sources. Water is a huge issue for all Oregonians and rushing without considering all concerns does a disservice to all citizens of this great State.

Sincerely,

Board of County Commissioners

John West, Chair

Herman E. Baertschiger, Jr., Vice Chair

Daniel E. DeYoung, Commissioner