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

RE: Groundwater Allocation Rulemaking

Dear Laura Hartt,

I am writing to express my strong opposition to the current groundwater allocation rulemaking proposed for the State of Oregon. As owner of Clouser Drilling Inc. in Southern Oregon and a current Government Affairs committee member of the Oregon Ground Water Association, I find the proposed rulemaking to be significantly flawed for the following reasons:

- The proposed rulemaking appears to be an oversimplified solution that does not adequately consider complex scientific data and environmental factors specific to each region's groundwater resources. The proposed methods of determining groundwater availability, specifically "the potential for substantial interference", are overly simplistic and unscientific.
- A "one size fits all" approach is harmful and impractical. Oregon is a State with diverse ecological regions, each with its unique water availability and needs. Implementing a uniform rule across the entire state disregards these differences and could lead to unfair and inequitable restrictions in areas where water is abundant if the Department is "unable to make a site-specific determination based on existing data."
- Potential for a detrimental economic impact to the agricultural industry, which is a major sector of Oregon's economy. The proposed rulemaking threatens to disrupt this critical industry by imposing constraints that could reduce water availability for irrigation, leading to decreased agricultural development and financial hardship for farmers and associated businesses.
- Water Levels are stabilizing in wells we are monitoring throughout our region.

Considering these concerns, I urge the Oregon Water Resources Department to pause the current rulemaking process for further analysis. This will allow for a more comprehensive plan for water policy that favors scientific-based policies and methods to evaluate the availability of this precious resource. As a longtime and active member of the groundwater industry, I value the sustainable and responsible, but beneficial, use of groundwater for all Oregonians.

Sincerely,

Kevin Gill

Owner

Clouser Drilling Inc.

Member OGWA/CGWA/NGWA

Licensed Water/Monitoring Well Driller in Oregon and California