HARTT Laura A * WRD

From:	Mark Morgan <mmorgan@hermiston.gov></mmorgan@hermiston.gov>
Sent:	Tuesday, April 9, 2024 9:01 AM
То:	WRD_DL_rule-coordinator
Subject:	New Groundwater Rights Rulemaking Comment

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Over-subscription of groundwater creates significant costs to existing residents of Hermiston.

The City of Hermiston supplies drinking water to more than 20,000 residents; 100% of which was supplied by stable/declining groundwater sources in 2023 from the Lower Umatilla Basin Critical Groundwater Management Area. The Hermiston City Council has taken numerous steps to protect future water supply.

In 1996, City Taxpayers approved a \$9M Levy to construct a 9-mile transmission pipe & treatment plant to supply Columbia River water to City residents & businesses. This facility now supplies significant non-potable water for industrial, agricultural, and employment uses, but the cost associated with pumping & treating the water means that the City's water utility still opts to produce most of its drinking water from groundwater wells.

In 2017, the Hermiston City Council voted to adjust the water utility rate structure from a "declining block rate," to an "inclining block rate," which increases the unit rate as more water is used. This change reduced total groundwater consumption by utility customers by 187 million gallons (15%) from 2018 to 2019, while nearly doubling costs to rate-payers. This change freed up some water rights capacity, but according to PSU, Hermiston has added approximately 2,100 residents (11.6% increase) from 2018 through 2023, with continued growth expected. With continued residential, commercial, and industrial growth, groundwater consumption in Hermiston in 2023 had nearly reached back to 2018 levels; just 23 million gallons (2.6%) less than 2018, with 2024 usage likely to surpass the 2018 mark.

In 2023, the City spent \$3M to expand potable water supply piping to enhance supply from it's Columbia River source, with plans of future needs from that source increasing. The city has also begun a Limited License application for an Aquifer Storage & Recovery (ASR) program to pump, treat, & store wintertime Columbia River water. This process will create relatively expensive water, but will be critical to ensuring potable water supply for the largest city in Eastern Oregon.

Hermiston is an example of how over-subscription of finite groundwater resources leads to significant costs to existing users.

Thanks,

Mark Morgan

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*Note: As of 1/1/24, my email domain has changed to "hermiston.gov"