



UNION COUNTY BOARD OF COMMISSIONERS

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Laura Hartt
Oregon Water Resources Department
725 Summer Street NE, Suite A
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RE: Comments on the 2024 Oregon Water Resources Department Proposed Groundwater Rules

The Union County Board of Commissioners offer the following testimony on the proposed new groundwater rules currently under consideration by the Oregon Water Resources Commission.

We support the objectives of the rules of “updating the groundwater allocation to be more protective of existing water right holders”. This is very important as agriculture in Oregon accounts for a high percentage of the State’s water use and is a vital economic sector in Union County.

Most water users agree there is a need to protect groundwater from over pumping where water levels are in decline and also to limit the long-term impact of unsustainable groundwater depletion around the state. Any OWRD rules must insure that decisions about allocation of new groundwater rights are made based on data specific to the area and watershed under consideration. The Upper Grande Ronde River Watershed Place-Based Water Planning Group in their implementation plan has identified that at this time the Upper Grande Ronde lacks sufficient groundwater monitoring wells, long term trend data, pumping/use data and data regarding surface water interactions. These are all needed to inform strategic groundwater resource planning and management.

The rules as proposed have the potential to stunt economic growth in our cities as well as hurt those in agriculture. OWRD could resolve this problem by making sure that water allocation decision are made only after necessary data is collected to back up those decisions. The proposed changes go too far, implementing a one size fits all for Oregon which is not a prudent decision.

Thank you for the opportunity to comment.

Sincerely,


R. Matthew Scarfo
Chairman


Donna Beverage
Commissioner


Paul Anderes
Commissioner