

To the Water Resources Committee/Oregon Water Resources Department
May 31, 2024

I write to you having recently understood that a local small farm (under a half acre) in rural Oregon was prohibited from using their water supply because they did not have commercial water right for watering their garden.

The small farmer grows their garden and sells their produce at a local Farmers Market and their use of domestic water is not a large commercial operation. It is closer to a thriving home garden at a half acre in size.

Small Farmers like this do not threaten the ground water supply in our coast range watershed and in this case the amount of water used fits within the domestic use amount allowed.

Prosecuting the small users of ground or spring water and preventing them from producing food in our small rural community seems particularly harsh given we need more small farmers who produce local produce to support local healthy produce. Many of these small farmers are motivated to produce food for their community more than to make money. They provide produce close to the market they sell from and their volume is barely a business. They are doing the work that benefits the local community and in this case they are not using a lot of water. In many cases these small farmers grow this produce without the use of pesticides and herbicides, which prevent those chemicals from becoming a part of the water in their watershed.

I believe the Water Resources Committee could set some criteria to allow for farming scaled to water use that is under the domestic threshold.

Given you say essential criteria includes:

“Determine water is available if groundwater is reasonably stable, does not interfere with surface water flows and the aquifer can produce the water at the requested amount.”

It seems if it is determined that water use is under a domestic level, the use would be allowable without a Commercial Water Right. This is important since the Commercial Water Right may not be available and would take out the farmers ability to produce and sell until the right is issued, if in fact it would be.

Please work to have your rules governing water use fit the variety of situations to include helping and sustaining small farms that are critical to small community food production. These producers are critical for healthy local food to be available to all income levels in small rural farmers markets.



Randall Koch
Neskowin, Oregon

I do not speak for the following County advisory committees but I am sharing these roles I have been in to indicate my service to the community related to land use, safety and community welfare.

Past Chair of the Neskowin Citizen Advisory Committee (2019-2023)
Current Chair of the Neskowin Community Plan Steering Sub-Committee (2023-25)