

Oregon Water Resources Department
Attn: Laura Hartt, Groundwater Allocation Rules Coordinator
725 Summer St NE, Suite A
Salem, Oregon 97301
Email: Laura.A.Hartt@water.oregon.gov

Received
MAY 28 2014
OWRD

Re: Ground Water Allocation Rulemaking

Dear Ms. Hartt,

Thank you for this opportunity to comment on the ground water allocation rulemaking. This is a joint letter of comment from the Water Resources chair and the Legislative Chair on behalf of the over 100 family owned ranches in the Jackson County Stockmen's Association (JCSA). We are writing concerning the Oregon Water Resources Department's (ORWD) rulemaking, pertaining to groundwater allocation for agricultural irrigation.

We strongly believe that OWRD should focus its energy and resources on groundwater studies, implemented across the state, before restructuring the groundwater allocation system. This proposed rulemaking systematically puts the cart before the horse and will result in a de facto moratorium on new groundwater use, even in areas where there is not a strain on groundwater.

We strongly believe changes to groundwater allocation should not be made through a rule making process. Rather this should be the purview of the State Legislature, after sufficient data has been gathered to justify legal changes, on a region-by-region basis.

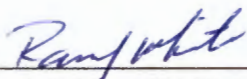
We strongly believe the proposed regulations will set standards not supported by sufficient data and that are not applicable statewide, leading to a one size fits all for ground water allocation among basins with vastly different ground water resources and demands.

We strongly believe that the proposed regulations will shift the burden of groundwater studies to individual landowners, many without the financial, human resources or expertise to perform multi-year studies before they can even apply for new groundwater rights. We presume that OWRD does have the resources and expertise to carry out the necessary studies, including studies leading to increased water conservation through monitoring, application, timing, improved plant cultivars, and other water saving measures. OWRD was directed and given funding for such studies through HB 2018.

We strongly believe the groundwater allocation rules will be contrary to the statutory directive that allows for beneficial use within the capacity of the resource. The moratorium created by the proposed rules will hamper sustainable beneficial use in areas where groundwater resources are not currently overdrawn.

In summary, we strongly urge you to commit the necessary energy, staff, financial resources, and time to complete effective groundwater studies and consider that our greatly diverse State has greatly diverse groundwater resources and greatly diverse beneficial use demands.

Sincerely,




Randy White, JCSA Water Resources Chair
grw158@gmail.com



Jon Elliott, JCSA Legislative Chair
antelopewestemail@gmail.com

Laura,

Jon Elliott and I are re-submitting the enclosed written comments, prior to the May 31, 2024 deadline, on behalf of the over 100 family ranch members of the Jackson County Stockmen's Association. We appreciate Oregon Water Resources Department review and comments.


Randy White,

Chairman
JCSA Water Resources Committee
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