

15001 NW Skyline Boulevard
Portland, Oregon 97231
25 September 2011

Jeana Eastman, Water Right Application Caseworker
Oregon Water Resources Department
725 Summer Street NW, Suite A
Salem, Oregon 97301-1266

RECEIVED

SEP 27 2011

WATER RESOURCES DEPT
SALEM, OREGON

Re: Application #: G-17456
Applicant: John Orlando
Location: 12735 NW Skyline Blvd.
Portland, OR 97231
T2N, R2W, Section 36
Well #: Mult 2008/Mult 99216

Dear Ms. Eastman:

I would like to submit the following concerns regarding the Application File # G-17456 during this 30 Day Period for Public Comment. For the past 22 years, I have lived on 100 acres located 1.1 miles from the Orlando property and have a 690 foot deep well which is designated for residential use. I, like so many local residents, am concerned about the future viability of our wells. I do not take it for granted that we have an endless supply of water and thus, we all must be careful of our water usage. Though my water source may or may not be affected by Mr. Orlando's activities directly, I want to express my concerns as a local resident.

1. Though we know pockets of water between the layers of basalt rock are our sources of water, there is a scarcity of data about that water into which our local wells are tapped. It seems because of this uncertainty, it is best to be conservative in water use until we know answers to some questions, such as:
 - a. How long (months, years, centuries) does it take surface water to seep its way into the pockets of water between layers of basalt rock which we up here are dependent upon as sources of water?
 - b. Is the source of water for our wells rechargeable? If yes, how long does this take?
 - c. How many wells can our area sustain?
 - d. Will we know we have a water problem only when we run out of water?

2. I question the validity that all of Mr. Orlando's 18.29 acres should be permitted for irrigation. His application states that water use would be for "crop irrigation", requesting the use of 15.5 gallons/minute for this purpose. Clearly not all of his 18.29 acres are designated for growing crops. In addition to some acreage growing crops, his 18.29 acres contain his residential house, a large barn, several outbuildings, very, very extensive landscaping, a large lawn, large parking areas for unpermitted large events (mostly weddings), a paved residential driveway, and a long access gravel roadway. From eye-balling Google Earth Maps, acreage not utilized for crop growing must take up at least 30% of his acreage if not more. (See Appendix A: Google Earth Map) **I believe Mr. Orlando should not be permitted by OWRD to irrigate his full 18.29 acres when the full 18.29 acres are not being used for his stated purpose of "crop irrigation." He should be permitted to irrigate only those acres utilized for true crops.** I would highly suggest

a site visit by OWRD to ascertain acreage designated for crop growing before final approval of his permit application. (See Appendix B: Photos)

3. I question the vigor and methodology of the possible conditions that might be included if a permit is issued (source: Letter to Orlando from Eastman dated August 26, 2011). I believe it imperative that this permit be monitored more closely in order to detect any early problems that might arise with his well water level or in his neighbors' wells.

a. (2) *The permittee shall be responsible for complying with each of the following requirements for measuring water levels in the well.*

(a) *... a water level measurement shall be made each year during the period March 1 through March 31.*

I question why Mr. Orlando might be required to measure his water level only once yearly and why the month of March might be chosen as the time period designated for measuring his water level.

- Firstly, March is the beginning of the year's irrigating period (March 1 through October 31). This would give his well months to recover some from the previous year's irrigating. A one-time March measurement would only provide a view into the potential long-term effect of irrigating on his well water level.
- Secondly, it would seem at least two, if not three, water level measurements should be required each year, one just before the irrigating season (February) and at least one more during the peak of irrigation (about August 15-September 1). This would more accurately measure the effects of his irrigating during the season, allowing immediate, pro-active modification of the amount of irrigation if needed.

(b) *Use of water from any well... shall be controlled or shut off if the well displays: An average water level decline of three or more feet per year for five consecutive years; or a total water level decline of fifteen or more feet; or a hydraulic interference decline of fifteen or more feet in any neighboring well...*

- Are these figures conservative enough to catch a potential problem before it becomes a true problem, or worst, a crisis? Again, the question: how long does it take our wells to recharge?
- Shouldn't the responsibility of measuring close neighbors' water levels be on the permittee since the permittee is using significantly more water than his neighbors?
- What is considered a "neighboring well"? Just abutting properties? Wells within a certain distance from his well? What?

RECEIVED

SEP 27 2011

WATER RESOURCES DEPT
SALEM, OREGON

4. Water-rights permits for irrigating are not common in our area. (See Appendix C: "Wells in Mr. Orlando's & Adjacent Township Sections") Granted, many properties are zoned as Commercial Forest Use or Rural Residential which make needing irrigation not usually necessary. But we do have numerous properties zoned as Exclusive Farm Use, as is Mr. Orlando's property. Granted most of these EFU properties are often Christmas tree farms or hobby farms or not farmed at all, again usually requiring no need for special irrigation. Mr. Orlando is unique in that he does truly grow crops that require water, yet the few other local crop growers do not have permits for irrigation, and they are productive. This does make one wonder why does Mr. Orlando needs to irrigate at the amount his is requesting? Mr. Orlando in his application stated "Organic

vegetable crops need a lot of water, 1" per week...". I believe "organic" does not necessarily mean all organic plants require "a lot of water." Are there more low water-requiring vegetable crops that would be better suited for growing in our area? Or can there be a balance between low water-requiring crops and thirsty plants? It would seem prudent of OWRD to require him to document more thoroughly reasons for his needs for water-rights to irrigate crops.


5. I am concerned that the application requests the right to irrigate a full eight months out of the year, from March 1 to October 31. Eight months of the year seems like a long period of time for needing irrigation in our Pacific Northwest environment. Based on average rainfall from 1929 to 2003 in Hillsboro, May 1 to October 30 would seem very adequate. (See Appendix D: " Mean Inches of Rainfall by Month in Hillsboro, OR, 1929-2003")

If his "crops" require irrigation March through October, i.e., 8 months, are they the right crops for the location and precipitation? At present, according to info on Portland Maps, 17.29 of the 18.29 acres at present are for dry farming. What is the reason that now all 18.29 acres require significant ongoing irrigation! The application states under C: Conservation "organic vegetable crops need a lot of water, 1 inch per week. We don't have a lot of water so we use drip to minimize consumption & waste." From what I see, not all of the 18.29 acres are for the use of growing organic vegetables. Has OWRD visited the property to see if this request is necessary?

We residents and businesses within NW unincorporated Multnomah County in the upper Rock Creek Watershed are dependent upon wells for water, though a few locals use spring water. Wells, depth of wells, and how many gallons/minute are often topics when neighbors get together. When a new well goes in, we all wonder if that well will negatively affect existing wells. When we see needless runoff from watering, we get nervous. When we moved into the area 22 years ago, several friendly neighbors made it very clear that we all had to use only the water we truly needed. I value farming and food production near high population, but I am concerned about needless use of water and the long-term effects of our local wells. I am afraid that if this permit is granted, the permittee will take full advantage of it.

Please place this letter and my concerns in your records as part of input to you during this Comment Period.

Sincerely,



Sen Speroff

sensperoff@hotmail.com

503-621-3331 home

503-708-1414 cell

RECEIVED

SEP 27 2011

WATER RESOURCES DEPT
SALEM, OREGON

Appendix A: Google Earth Map of Mr. Orlando's Property "Skyline Farm"



- Yellow on the south side of NW Skyline Blvd. indicates Mr. Orlando's property lines.
- North of my added Black Line is my rough guess of what land is dedicated to extensive landscaping, parking, buildings, & roadways which appear to me as not areas dedicated to crop growing or potential crop growing.

RECEIVED

SEP 27 2011

WATER RESOURCES DEPT
SALEM, OREGON

Appendix B: Photos of Skyline Farm taken on September 25, 2011



Shooting toward the NW corner of property adjacent to Skyline Blvd.



Taken along Skyline Blvd. toward entrance of one driveway.

RECEIVED
SEP 27 2011
WATER RESOURCES DEPT
SALEM, OREGON



Taken from Skyline Blvd shooting toward westerly direction.



Taken from an adjacent east neighbor's property.

RECEIVED
SEP 27 2011
WATER RESOURCES DEPT
SALEM, OREGON



Adjacent to Skyline Blvd shooting southeastward from the northwest corner of the property.

RECEIVED

SEP 27 2011

WATER RESOURCES DEPT
SALEM, OREGON



Section of 0.2 mile landscaping on embankment along Skyline Blvd.



The northwest section of the Farm roadway
Going straight loops around to the southern entrance at the "Skyline Farm" signage.
Going to the right enters the northwest parking area.

RECEIVED
SEP 27 2011
WATER RESOURCES DEPT
SALEM, OREGON



Water in drainage not from rainfall (there was only a trace of rain in the past 24 hrs)

RECEIVED

SEP 27 2011

WATER RESOURCES DEPT
SALEM, OREGON



Shooting southeastward along Skyline Blvd.



Along Skyline Blvd. looking towards the Orlando residence.

RECEIVED
SEP 27 2011
WATER RESOURCES DEPT
SALEM, OREGON

Appendix C: Wells in Mr. Orlando's and Neighboring Township Sections

Section, Township, Range	# Wells Recorded	# Abandoned	# Domestic Use	# Irrigation	# Other
Section 35, T2N, R2W	20	4	12	1	3 Thermal Heat
Section 26, T2N, R2W	36	1	35	0	1 livestock & domestic
Section 36, T2N, R2W	30	0	29	0	1 geotechnical
Section 25, T2N, R2W	22	0	21	0	1 domestic + livestock
Section 31, T2N, R1W	79	23	36	1 (field at Skyline School)	
Section 36 T2N, R2W	30	0	29	0	1 unknown

(Source: OWRD's website at http://apps.wrd.state.or.us/apps/gw/well_log/)

Appendix D: Mean Inches of Rainfall by Month in Hillsboro, Oregon, 1929 to 2003

Month	Jan.	Feb.	Mar.	Apr.	May	June	July	Aug.	Sept.	Oct.	Nov.	Dec.
Rain	5.99	4.42	3.93	2.20	1.75	1.42	0.46	0.73	1.43	2.98	5.63	6.80

Source: <http://www.wrcc.dri.edu/cgi-bin/cliMONtpre.pl?or3908>

RECEIVED

SEP 27 2011

WATER RESOURCES DEPT
SALEM, OREGON