

## CENTRAL OREGON CITIES ORGANIZATION

BEND, CULVER, LA PINE, MADRAS, MAUPIN METOLIUS, PRINEVILLE, REDMOND, SISTERS

February 8, 2010

Ruben Ochoa, Rules Coordinator Oregon Water Resources Department 725 Summer Street NE, Suite A Salem, OR 97301-1271

RE: Draft Division 522 administrative rules - Deschutes Basin Mitigation

Dear Mr. Ochoa:

The Central Oregon Cities Organization (COCO) was formally created in 2002 and has grown to include Bend, Culver, La Pine, Madras, Maupin, Metolius, Prineville, Redmond and Sisters. COCO's purpose is to effectively and efficiently promote the common interests of the cities in Central Oregon in such issues as water, transportation, economic development, school funding and tax reform.

For a number of reasons, COCO is particularly interested in the Deschutes Basin Groundwater Mitigation Program (Mitigation Program) and the HB 3494 report and stakeholder process intended to address issues related to that program. First, municipalities have a duty to serve and plan for the future, which requires a secure and sustainable water supply for population growth and economic development. In addition, the cities need a functional and efficient mitigation program in order to meet their future water supply needs. Finally, COCO's members have an interest in the natural environment and quality of life in their region, including preservation and enhancement of stream flows to meet instream needs.

As a result of its interest in the HB 3494 process, COCO has participated in the HB 3494 report process. Additionally, COCO was involved in the consensus rulemaking process.

COCO has reviewed the draft Division 522 administrative rules that are currently open for comment. COCO supports the draft rules and believes the proposed changes will provide significant improvements to the Deschutes mitigation program and will enhance the ability of the cities in the basin to meet future water needs for population growth and economic development.

Thank you for OWRD's leadership in this effort to improve the efficacy of the Deschutes Mitigation Program.

Sincerely,

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WATER RESOURCES DEPT SALEM, OREGON

Chair, Central Oregon Cities Organization