

## Attachment 2b Form Letter Written Public Comments

**Summary:** OWRD received 122 emails from 121 members of the public submitting the following comments; one member submitted the same comment twice and 23 members submitted modified comments, as noted in the table below:

Dear Rulemaking Coordinator Laura Hartt,

1 Thank you for the opportunity to provide comment on the Oregon Water Resource Department's  
2 2025-2026 Water Rights Rulemaking.

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4 These comments primarily focus on the opportunity this rulemaking presents to improve the  
5 interaction between the Oregon Water Resource Department's water use regulations and the  
6 Department of Land Conservation and Development's land use regulations.

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8 Our state land use system is unique in the country for how it prioritizes farm and forest uses in  
9 rural areas, while directing population growth inside cities' urban growth boundaries.

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11 OWRD's Water Rights Rulemaking process provides an important opportunity to

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- 13 • Grapple with questions related to the sequencing of water right decision-making and land  
14 use decision-making
- 15 • Consider how water permitting might better align with the goals of the land use system

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17 As part of the rulemaking process, OWRD and the Rules Advisory Committee (RAC) took  
18 important steps to consider and suggest rule revisions to address land use related topics during  
19 the nine RAC meetings held in the Fall and Winter of 2025. However, following the final RAC  
20 meeting, the agency abandoned nearly all proposed land use changes.

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22 I strongly recommended that OWRD:

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- 24 • Reconsider the decision to abandon proposed rule language on land use that was  
25 considered by the RAC. While a more comprehensive review in the future is needed, OWRD  
26 should not miss this important opportunity to better align OWRD and DLCD regulations.
- 27 • Convene a more comprehensive review of misalignment between water and land use  
28 regulations at a later date.
- 29 • Ensure there are consistent processes for both instream and out-of-stream water rights.

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31 The management of Oregon's water is one of the most important issues facing our state and I  
32 appreciate OWRD's work to serve the public by practicing and promoting responsible water  
33 management.

Sincerely,  
 [Name]  
 [City], [State]

The table below includes additional comments and/or modifications to the form comments.

Name	County/State	Modified Comment(s) - Response
Alberto Fiol	Deschutes	<b>Omits lines 4-20</b>
Alice Elshoff	Deschutes	N/A
Amy vanderLaan	Deschutes	N/A
Andrea Casey	Deschutes	N/A
Ann Nowicki	Lane	N/A
Annis Henson	Deschutes	<p><b>Replaces lines 4-9</b> - Good morning, as a League of Woman Voters member in Roseburg, 1970-1974, believe it or not, our LWV had input on the establishment of our still renown Department of Land Conservation and Development's ways of saving our state's natural resources, especially our water resources. Later we moved to Deschutes County where my husband was a young Director of the Deschutes County Mental Health Clinic</p> <p>My career was as Field Staff for Habitat for Humanity throughout the West. I saw how poorly Idaho and WA, and MT did NOT deal with Land Use. They still are so far behind our state. This is not the time to fall backwards into oblivion as far as your Rule Making powers are concerned. As a current member of our County's LWV, I prevail upon you to listen today and act upon input such as mine.</p> <p>Rule making is crucial for continuing AND even improving the working relationships between our Land Use guidelines &amp; water resource management. I understand that the Final rules to be selected did not really follow your own Advisory Committee's input. In other words, that input seems to have been ignored. Today you have the chance to fix this. Pretty please do so. Lucky us, the wise LCDC rules have allowed us to grow enough and wisely enough that we now not only have our son and his family in Bend</p>

		since 2003, but also now one of our UO grandson graduates lives in Bend with a job with a Dept of Oregon state government. My concern is for those generations and future greatgrandchildren to be Oregonians with a conscience toward onward wisdom for OUR rivers, groundwater and communities.
Ashley Karitis	Deschutes	<b>Omits lines 4-20</b>
Beth Levin	Multnomah	N/A
Brent Rocks	Multnomah	N/A
Bridget Tinsley	Deschutes	<b>Inserts after line 3</b> - Public input and steering committees are an important part of fair and transparent decision making. This is especially true when considering precious public resources such as water!
Bryant Robey	Deschutes	<b>Omits lines 4-20</b>
Callie Magdziuk	Deschutes	N/A
Cara Frank	Deschutes	N/A
Carol Moorehead	Deschutes	<b>Replaces lines 4-20</b> - In Oregon, we have water rights rules dating from the 1800's. Today, we have a very different landscape in Oregon. Development, population growth, and drought have made water resources less available and more precious.
Chris Scheer	Deschutes	N/A
Christine Larson	Deschutes	<b>Replaces lines 4-29</b> - OWRD needs to look out for current residents and farmers in our rural communities. We moved to the country many years ago to enjoy rural life. A few years ago two of the commissioners approved Thornburg Resort's use of ground water. We are less than three miles away and wells are going dry. Proper notification to the Warm Springs reservation was not given. Public notice was a joke as the resort is almost completely in the middle of BLM, and Eagle Crest resort is next to the development. Allowing developers to play the shell games with water that was acceptable 20 years ago is not the same as today. Eagle Crest has had well issues as well.

		<p>Increasing density in rural areas is detrimental to our area.</p> <p>Tumalo irrigation ditches will be piped soon. This will prevent our aquifer from being replenished.</p> <p>Water decisions need to take in consideration water is not limitless.</p> <p>Arizona and Maui are two states to learn from. Please look at the current state of our water supply before approving countless homes and old resort plans that are really just glorified subdivisions.</p>
Cierra Buer	Crook	N/A
Cliff Mitchell	Deschutes	N/A
Clint Landeen	Clackamas	N/A
Connie Peterson	Deschutes	<b>Inserts after line 28</b> - I am particularly concerned about how water use is currently allowed on "hobby farms.
David Nichols	Multnomah	N/A
Debra Rehn	Multnomah	N/A
Derek Gendvil	NV	N/A
Diana Pace	Douglas	<b>Inserts before line 4</b> - Time to stop allotting water to grow hay in the high desert.
Diana Saxon	Marion	N/A
Diane Chavez	Marion	N/A
Diane Mattoz	Multnomah	N/A
Donna Harris	Deschutes	N/A
Dorothy Tharsing	Coos	N/A
Doug Kogan	Deschutes	<p><b>Omits lines 4-20</b></p> <p><b>Department Response</b> – See general response.</p>
Elizabeth Austin	Multnomah	N/A
Emily Woodworth	Deschutes	<b>Inserts after line 3</b> - I'm writing to you as a long-time Oregon resident and as someone who works for a nonprofit in the conservation sector.
Erin Rifkin	WA	N/A
Evan Schreiber	Deschutes	<b>Omits line 4-20; modifies line 22</b> - "Hello decision makers! Please..."
Gary Kline	Deschutes	N/A
Gayle Norie	Deschutes	N/A
Gwen Schneider	Deschutes	N/A
Hailee Newman	Deschutes	N/A

Hana Sant	Clackamas	N/A
Hilary Garrett	Deschutes	N/A
Ian Shelley	Multnomah	N/A
Isabella Waldman	Deschutes	N/A
Jamie Collins	Deschutes	N/A
Jan Renee	Multnomah	N/A
Janice Snyder	Multnomah	<b>Inserts after line 7</b> - Every decision we make about land use ought to consider what we are leaving for our great great grandchildren to inherit, and need to recognize water is sacred and limited.
Janna Piper	Multnomah	N/A
Jean Thornsbury	WA	N/A
Jennifer Gunnell	Deschutes	N/A
Jennifer Will	Deschutes	N/A
Jenny Chism	Douglas	<b>Inserts after line 29:</b> Stop charging citizens for water. Basic necessities of life and liberty are a right. Improve money management to include free clean water and clean air for Oregon residents.
Jeremy Fox	Deschutes	N/A
Jesse Rosenweig	Deschutes	N/A
Jessica Grillo	Deschutes	N/A
Jessica Jern	WY	N/A
Joe Craig	Deschutes	N/A
John Blankfort	Deschutes	N/A
Joshua Mooney	Deschutes	N/A
Juanita Rinas	Lane	N/A
Judy Stevenson	Multnomah	N/A
Karen Lilebo	Deschutes	N/A
Kari Ferber	Crook	<b>Omits lines 4-20</b>
Kathleen Reynolds	Jefferson	N/A
Kathleen Roche	Deschutes	N/A
Keith Harris	Deschutes	N/A
Kelsie Greer	Deschutes	N/A
Kendall Brawner	Multnomah	N/A
Kim Hasson	Deschutes	N/A
Kirk Barnes	Deschutes	N/A
Lace Thornberg	Deschutes	N/A
Lacey Kloster	Deschutes	<b>Inserts after line 30-</b> As a water rights holder and wildlife advocate, I hope you will reconsider the suggestions put forth by the RAC because I want Oregon's people, land, and animals to be

		able to thrive in the future, but we need to ensure we are stewards of our precious water resources.
Larry Green	Deschutes	N/A
Linda Hendrix	Deschutes	N/A
Lorraine Murray	Crook	<b>Replaces lines 4-9</b> -These comments highlight the potential for this rulemaking to better align the Oregon Water Resources Department’s water use framework with the land use policies administered by the Department of Land Conservation and Development. Oregon’s land use system stands apart nationally for its clear emphasis on protecting agricultural and forest lands in rural areas, while channeling most population growth into cities through urban growth boundaries.
Malcolm Costello	Deschutes	<b>Replaces lines 4-29</b> - In the face of both climate change and population growth, water permitting is becoming a ever more pressing issue in balancing the needs of farmers and foresters, sustainable salmon and steelhead populations, outdoor recreation, and growth of our cities and towns within the land use framework – particularly here in Central Oregon. Hence it was with dismay that I read that the thoughtful recommendations regarding draft rule language made by the Rules Advisory Committee in the latter half of 2025 was largely abandoned by the agency. I strongly recommend you reconsider this decision, and your rule-making takes into account the impact of Oregon’s unique land use regulations on water needs, and addresses both in-stream and out-of-stream water rights.
Marcia Volk	Deschutes	N/A
Markell McCubbin	UT	N/A
Mary Bailey	Deschutes	N/A
Mary Bauer	Lane	N/A
Mary Becker	Deschutes	N/A
Mary Pantenburg	Douglas	N/A
Matt Redfern	Deschutes	N/A
Maya Holzman	Deschutes	N/A

Michael vanderLaan	Deschutes	N/A
Michele Kribs	Multnomah	<p><b>Inserts after line 3</b> - As a property owner down is Sunriver, I've seen my fair share of what I call water abuse. From developments like Caldera creating now 3 artificial lakes using our precious ground water that should be used primarily for drinking water, to neighbors putting in lawns that require at least two hours of watering daily in the heat of our dry summers. And, let's not forget the multitude of golf courses And the multi-national Corporations running our ground waters dry during their 24/7 over production of ag that we as US citizens do not gaining anything but the death of our Southern Oregon lands.</p> <p>We need to protect our ground water, our potable water for future generations. Time to get your heads out of the corporate asses and do what is right for our futures drinking water.</p>
Michele Mckay	Deschutes	N/A
Michele Penner	Deschutes	<p><b>Inserts below line 3)</b>- I am very concerned about big tech companies use of Oregon water. Cliff Bentz is right now trying to steal water for a tech company to use by working to buy 150 acres of land from the forest service for the Dalles. Tech already uses 30% of the Dalles' water and now they are trying to get more. My greatest concern is that Oregon's water will be given away along with tax breaks and no recompensation for either. The big tech companies have been over using water all over the world and short term thinkers like Cliff Bentz will get into contracts that will steal more and more water out of Oregon. The big tech companies need to pay for water and laws need to be set so Oregon water is not over used by tech.</p>
Michelle Alvarado	Deschutes	N/A
Nancy Engelhard	Deschutes	N/A
Nancy Hinnen	Deschutes	N/A
Nathaniel Feyma	Lane	N/A
Nick Cappy	Deschutes	N/A
Nikki Nafziger	WA	N/A

Owen Murphy	Deschutes	N/A
Paula Hawes	Deschutes	N/A
Randy Wald	Deschutes	N/A
Renee Clark	Lincoln	N/A
Richard Pross	Clackamas	N/A
Rima Givot	Deschutes	N/A
Robert Kuntz	Deschutes	<b>Replaces lines 4-9</b> - The Oregon state land use system is unique in the country for how it prioritizes farm and forest uses in rural areas, while directing population growth inside cities' urban growth boundaries. OWRD's Water Rights Rulemaking process provides an important opportunity to:
Robyn Tatom	Deschutes	N/A
Sam Lowry	Deschutes	<b>Replaces lines 4-22</b> - My understanding from friends at Central Oregon LandWatch is that this rulemaking presents an opportunity to improve the interaction between the Oregon Water Resource Department's water use regulations, and the Department of Land Conservation and Development's land use regulations—unique in the country for how they prioritize farm and forest uses in rural areas, directing population growth inside cities' urban growth boundaries. Apparently, as part of the rulemaking process, during nine meetings held in Fall and Winter of 2025, OWRD and the Rules Advisory Committee (RAC) took important steps to develop rule revisions to address land use topics, then after the final RAC meeting abandoned nearly all the proposed land use changes. This is unfortunate. I join others in asking that..."
Sandra Fox	Deschutes	N/A
Sara Pritt	Lane	N/A
Scott Kennedy	Marion	N/A
Shaelynn Davis	Deschutes	N/A
Shannon Hodgen	Deschutes	N/A
Sherry Brainert	Deschutes	N/A
Spencer Bailey	Deschutes	N/A
Stephanie Moersfelder	Deschutes	N/A
Steve Clough	Missouri	N/A
Steve Hare	Deschutes	N/A

Steven Freer	Deschutes	<p><b>Replaces lines 4-20</b> - I am deeply concerned about the profligate use of water in central Oregon and across the state more broadly. There is good evidence that the surface and ground water sources are interconnected, and that the aquifer beneath our feet is being depleted at a rate in excess of its recharge rate. All evidence based modeling suggests that we will see less precipitation coming as snow in the region as the climate continues to warm, further reducing the recharge rate. Meanwhile the demands on these resources by development continue to grow. Thus it has never been more urgent that we find coherent and well aligned processes for managing water use in the region.</p>
Stuart Habel	Deschutes	N/A
Susan Boehlert	Deschutes	N/A
Susan Cress	Deschutes	N/A
Susan Heath	Linn	N/A
Susanna DeFazio	Deschutes	N/A
Tristy Osbon	Deschutes	N/A
Vikki Hickman	Deschutes	N/A
Zachary Stewart	Deschutes	N/A
Zechariah Heck	Deschutes	N/A