

Water Resource Commission  
Meeting December 3, 2021  
Agenda Items D and J

Hello Commissioners:

I am concerned that drought and climate change are not being planned for sufficiently in the management of our groundwater resources in the **Deschutes Basin**.

The 5 year update ending 2019 for the Deschutes Groundwater Mitigation Rules continues to identify places where water conservation measures can be improved.

Examples would be:

Install a new gauge to replace the now unused gauge at Lower Bridge.

Require that Water Management Conservation Plans WMCP's account for 100% of their groundwater useage: the 10% of municipal groundwater that is not required to be accounted for needs to be accounted for by type of use as well as billed for.

Implement the No Nett Loss of Wetlands that Governor Brown and Department of State Land (DSL) is now gearing up for.

Refine the zone of mitigation so that mitigation occurs in the zone of impact and not in a general zone especially where there are springs and/or wetlands in a specific zone of impact. Refine the incremental mitigation plan so that permanent mitigation is in hand before municipal permits are issued: otherwise as it now stands there is already concern that permanent mitigation is unobtainable in the future or even incrementally. Recognize that Urban Cities' densities will continue without necessarily retiring nearby agricultural water rights as was done in the past because cities are now building density instead of sprawling the UGB onto nearby agricultural lands outside city limits. Cities will increase their water needs without obtaining the agricultural water rights that heretofore they could mitigate with. Remove the mitigation bank that has not been active and has not been licensed by the Secretary of State since 2017: i.e. Deschutes Irrigation, LLC \* These are all situations that hereto have not been accounted for in the Deschutes Groundwater Mitigation Rules and that would conserve groundwater already permitted.

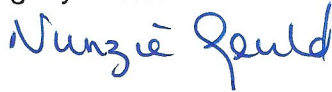
Drought and Climate Change heat waves are Real. The Deschutes Basin was not immune to these. Drought and Climate Change are impacting not just acquifer charge but are also impacting how people are behaving. Examples of this are: in stream leased water will be reduced as it is increasingly being needed on lands for agriculture and/or lifestyle. Many lifestyle choices to create water in people's front yards in the desert are new uses being applied for from groundwater wells. Because of drought where agricultural water rights are being reduced in delivery because of water availability, Habitat Conservation Plans, or ESA requirements, more people will draw water from the ground. So for instance exempt wells should now be included in Groundwater measurements in the Deschutes Basin: it is NOW no longer appropriate to assume a rural household consumes the same as a municipal household because the rural household has a larger footprint than the municipal household. So assumptions of water demands need to be scrutinized according to climate change and drought.

Finally the Deschutes Groundwater Mitigation Rules today do not mitigate for groundwater extraction. We've known this since the modeling of the Yinger Report in 2008 (13 years ago). Further discussions by Gannet in 2012 elaborate on climate. However, the answer that OWRD is requesting of the Water Resource Commission is to begin exploring within 1 month (year 2022) to increase the 200 cfs cap. It is inappropriate to increase the 200 cfs cap before all of the items identified in the (ODFW) Oregon Department of Fish and Wildlife's submittals Oct 2021 have been IMPLEMENTED.

I look to your Water Resource Commission as a steward of our Public Waters for descendants of Oregonians. Implementing conservation measures and protecting springs and wetlands in our aridifying High Desert is a priority over doing ecological harm to our surface waters by extending the 200 cfs cap.

Thank you for considering my views.

Nunzie Gould  
19845 JW Brown  
Bend, OR 97701



\* Exhibit A: SOS registry re Deschutes Irrigation LLC.

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## Business Entity Data

12-01-2021  
13:21

Registry Nbr	Entity Type	Entity Status	Jurisdiction	Registry Date	Next Renewal Date	Renewal Due?
213699-96	DLLC	INA	OREGON	04-14-2004		
Entity Name DESCHUTES IRRIGATION, LLC						
Foreign Name						

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## Associated Names

Type						
PPB	PRINCIPAL PLACE OF BUSINESS					
Addr 1	61540 BEARWALLOW RD					
Addr 2						
CSZ	BEND	OR	97701	Country	UNITED STATES OF AMERICA	

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Type				Start Date	Resign Date
AGT	REGISTERED AGENT			05-27-2011	
Name	DIANA	W	SHORT		
Addr 1	61540 BEARWALLOW RD				
Addr 2					
CSZ	BEND	OR	97701	Country	UNITED STATES OF AMERICA

Type						
MAL	MAILING ADDRESS					
Addr 1	PO BOX 1830					
Addr 2						
CSZ	BEND	OR	97709	Country	UNITED STATES OF AMERICA	

Type					Resign Date
MEM	MEMBER				
Of Record	<a href="#">224740-92</a>	MANZANITA MARKETING GROUP, LLC			
Addr 1	PO BOX 1830				

Addr 2					
CSZ	BEND	OR	97709	Country	UNITED STATES OF AMERICA
Type	MGR	MANAGER			Resign Date
Name	DIANA	W	SHORT		
Addr 1	PO BOX 1830				
Addr 2					
CSZ	BEND	OR	97709	Country	UNITED STATES OF AMERICA






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## Name History

Business Entity Name	Name Type	Name Status	Start Date	End Date
DESCHUTES IRRIGATION, LLC	EN	CUR	04-14-2004	

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## Summary History

Image Available	Action	Transaction Date	Effective Date	Status	Name/Agent Change	Dissolved By
	ADMINISTRATIVE DISSOLUTION	06-15-2017		SYS		
	ANNUAL REPORT	04-15-2016		FI		
	ANNUAL REPORT	04-22-2015		FI		
	ANNUAL REPORT	04-16-2014		FI		
	AMENDED ANNUAL REPORT	04-15-2013		FI		
	AMENDED ANNUAL REPORT	03-19-2012		FI		
	AMENDED ANNUAL REPORT	05-27-2011		FI	Agent	
	REINSTATEMENT AMENDED	03-23-2011		FI		
	ADMINISTRATIVE DISSOLUTION	06-10-2010		SYS		
	AMNDMT TO ANNUAL RPT/INFO STATEMENT	02-12-2010		FI		
	REINSTATEMENT AMENDED	12-16-2009		FI		
	ADMINISTRATIVE DISSOLUTION	06-12-2009		SYS		
	ANNUAL REPORT		04-01-			

	PAYMENT	04-03-2008	2008	SYS		
	CHANGE OF REGISTERED AGENT/ADDRESS	04-02-2008		FI	Agent	
	ANNUAL REPORT PAYMENT	04-17-2007	04-16-2007	SYS		
	CHANGE OF REGISTERED AGENT/ADDRESS	04-12-2006		FI	Agent	
	ANNUAL REPORT PAYMENT	03-14-2006	03-13-2006	SYS		
	AMENDED ANNUAL REPORT	03-30-2005		FI		
	ARTICLES OF ORGANIZATION	04-14-2004		FI	Agent	

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