



CITY OF KLAMATH FALLS, OREGON

500 KLAMATH AVENUE – P.O. BOX 237
KLAMATH FALLS, OREGON 97601



February 10, 2025

Representative Ken Helm, Co-Chair
Representative Mark Owens, Co-Chair
Committee Members
House Committee on Agricultural, Land Use, Natural Resources, and Water
Oregon State Legislature
900 Court St. NE
Salem, Oregon 97301

Subject: Support for HB 2169

Dear Co-Chairs and Committee Members:

The City of Klamath Falls is writing in support of HB 2169. HB 2169 directs the Oregon Department of Environmental Quality (DEQ) to continue its efforts, started under previous legislation, to address regulatory barriers, develop technical assistance resources, and implement a coordinated state program to support new and expanded water reuse opportunities, in consultation with other state agencies, municipal wastewater utilities, and other stakeholders. Like many other public wastewater utilities, the City of Klamath Falls looks for solutions to water quality challenges that provide the best fit in our community from a water quality compliance, sustainability, and economic standpoint, and that provide maximum benefits from public water infrastructure investments. The City of Klamath Falls is very interested in exploring water reuse opportunities as part of its long-term integrated water management strategy. However, current regulatory policies implemented by both DEQ and the Water Resources Department (WRD) make these opportunities seem out of reach.

HB 2169 is needed because Oregon's permitting requirements are decades old, and wastewater utilities have found the regulatory process to be difficult, and sometimes too complex and costly, to navigate. HB 2169 is also needed to cause improved coordination and collaboration among state agencies with the directive to implement the state's policies encouraging and supporting the development of reuse projects. DEQ and WRD historically have not had the resources or a sufficient mandate to work to resolve these issues. This has deterred utilities from pursuing the types of water quality compliance projects that have multiple environmental, community, and economic benefits. At the same time, publicly owned treatment facilities face new or increased permit requirements for things like temperature and nutrients.

When our wastewater discharge permit was renewed in 2020 by DEQ we found ourselves facing stringent nutrient and wintertime temperature limits. Temperature limits are so stringent that we will need to cool our effluent during the winter if we continue discharging to the Klamath River.

The city would prefer to implement a sustainable, broader beneficial reuse program that provides a resilient source of water to those in desperate need of recycled water for beneficial use. We have the support of the city council, the local agricultural community and the Klamath Irrigation District. They want our resilient source of water, but the regulations are such that our effluent, even when treated to the highest recycled water standards, cannot be conveyed in their irrigation canal system and would thus require a costly pipe network. The city needs viable water reuse options and the willingness of DEQ

and other state agencies to work with the city to find ways to protect the environment and allow sustainable beneficial reuse projects.

Now is the time for Oregon to expand recycled water and other beneficial land application opportunities as part of the solution to water, climate, and economic challenges. Other states have modernized their rules to harness treated wastewater as a highly valuable resource. Without passage of HB 2169--a continued mandate and funding for DEQ and other state agencies to tackle the work—recent efforts to update Oregon’s recycled water regulatory framework and improve interagency coordination and collaboration cannot be sustained, and Oregonians will not be able to fully realize the resource recovery values that beneficial reuse projects have to offer. Please enact HB 2169.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark Willrett', written in a cursive style.

Mark W. Willrett, P.E.

Director of Public Works