WATER LEAGUE

Engaging the public in water stewardship.

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April 18, 2024

To:
- Representatives Ken Helm and Pam Marsh
- Senators Jeff Golden and Floyd Prozanski
- OWRD Water Policy Analyst/Legislative Coordinator, Bryn Hudson
- OWRD Deputy Director, Strategy & Administration. Racquel Rancier
- Senior Natural Resources Advisor to Governor Kotek, Geoffrey Huntington
- Water Resource Commissioners Kathy Kihara, Jan Lee Weinberg, Joe Moll, Eric Quaempts (Chair), Meg Reeves, Julie Smitherman (Vice-Chair), and Woody Wolfe

Re:
Critique and context of ORS 537.545(1)(b) and the history associated with the 1955 Groundwater Act, the interim Water Resources Committee, and HB 25 and HB 26 in the 1955 legislative session that expanded ORS 536 and ORS 537, respectively.

Water League wrote on March 27, 2024, our request for a simple but important change to ORS 537.545:

> (1)(b) Watering any lawn or ~~noncommercial~~ garden not exceeding one-half acre in area;

We wrote that we would follow up that letter with an appendix detailing our findings and concerns -- below we explain why we request this change in the law during the 2025 legislative session.

Thank you,

Christopher Hall
Executive Director

The Historical Flaws that Led to Shutting Down Oregon's Farmers' Market Gardeners Who Use Their Exempt Domestic Well to Irrigate Their Crops for Sale: ORS 537.545(1)(b)

Recently, OWRD targeted local farmers' market gardeners and shut them down following a proactive review of satellite imagery and staff site visits to inspect locations they suspected violated the law. Historically, most enforcement actions by OWRD have been complaint-driven except for those that are obvious threats to the public health, safety, and welfare. This proactive offensive strongly suggests a misguided agenda.

First, we point out the mismanagement of staff resources to proactively target local gardeners on their 1/2 acre plots, by setting the action in the context of the 2024 Integrated Water Resources Strategy (IWRS) draft update, which states [**emphasis added**]:

> The Department's limited number of field staff is noteworthy, given the large geographic territory and responsibilities (Figure 4-4). In southeast Oregon, District 10, has just two staff responsible for regulating and distributing water in an area covering 11,700 square miles, the largest district in the state. **In northwest Oregon, the District 16 watermaster oversees several hundred dams of various sizes and configurations that need routine inspection and site visits. In this district alone, there are 14,700 water rights that authorize the use of groundwater, surface water, and storage for a variety of uses.** (Page 173)

The article breaking the news on targeting farmers' market gardeners refers to Mike McCord, the Northwest Region Manager who oversees not only District 16 but five other districts as well. According to the article, "McCord said officials use aerial photography, complaints from neighbors, and in-the-field observation to find potential violations. He said new funding in 2021 allowed the state to hire more staff for enforcement." We note, in a recent article in The Capital Press on the question of Field Services staff behavior, the common knowledge statement by the reporter that the Assistant Watermasters were hired to address the dire problems associated with the cannabis industry:

> In recent years, OWRD has dedicated millions of additional dollars to stepped-up water rights enforcement, particularly at cannabis operations in Southwest Oregon.
>
> Lawmakers approved the increases due to complaints about water theft and other problems caused by illicit marijuana production.

The management decision to use OWRD funds and staff time, which are widely regarded as too precious to waste on frivolous enterprises such as sacking small-time local food producers, is just one question among many we have. We address the inconsistency of OWRD ignoring the organized crime syndicates' water theft near the end of our discourse (not even sending them threat letters) and prioritizing soft targets instead.

But first, a thorough review of the history that brought us to where we are today.

Of water and the law, Mr. McCord said:

> "It's a finite resource," said Mike McCord, the Northwest Region Manager with the Oregon Water Resources Department. "The system of appropriation has been in place since 1909 in Oregon. It allows us to better manage the resource by having a permitting system."

Mr. McCord must not have known that irrigating a 1/2 acre garden for profit was legal until Oregon outlawed the practice in 1955. Before 1955, "watering lawns and gardens for profit" was an exempt use. We are unaware of enforcement actions since legislators passed HB 26 almost 70 years ago prohibiting the exempt use of domestic wells for 1/2 acre commercial gardens. We are also unaware of crackdowns on lawns that exceed 1/2 acre. Notably, HB 26 added to exempt uses 5,000 gallons per day for any single industrial or commercial water use while stripping away watering 1/2 acre gardens for profit. Also of note is that 5,000 gallons per day is twice the water volume needed to irrigate a 1/2 acre market garden. This double standard and the permissive stance toward unlawful oversized lawns across the state undermines Mike McCord's logic to crack down on local gardeners. We wonder where else this enforcement activity is occurring, or if Lane County has been singled out for cause.

We have researched answers to the public's questions about the testimony and legislative intent at the time the state passed HB 26 in 1955. Our research provides context to better understand the public's outrage at the recent enforcement action against local produce sellers. We have acquired nearly 1,300 pages of historical records from our requests of the Oregon Archives staff and from a two-day visit to electronically capture all of the available hard copy documents on file. We know our research on this matter has been exhaustive because the archive staff told us so after scouring all the paper files, electronic files, and microfilm in their possession. We have pored through all the documents after transforming them into searchable text, and we have read the entire historical record and noted a great many details. Presented below are our findings and concerns about how Oregon arrived at this place where OWRD staff proactively sent threat letters to small-time gardeners.

We start in the years leading up to the 1927 legislative session when the Oregon Reclamation Congress (once called the Oregon Irrigation Congress, and today called the Oregon Water Resources Congress (OWRC)) supported legislation regulating groundwater east of the Cascade Mountains in the Oregon Desert. The OWRC is among the most powerful and influential lobby organizations in Oregon and has had the ear of elected and appointed officials for over 100 years.

(*Note: given the similarity in verbiage, we must clarify that the interim Water Resources Committee empaneled by HB 440 in 1953 is not to be confused with the Oregon Water Resources Congress (OWRC) a lobby house; nor should it be confused with the Oregon Water Resources Commission, a government body currently overseeing the Oregon Water Resources Department, a government agency.*)

The 1927 law survived for 28 years until it was replaced by HB 26, called the 1955 Groundwater Act. The 1927 provisions relating to groundwater use east of the Cascade Mountains "were rewritten and made applicable to the entire state in 1955," according to a brief history written by the OWRC and a statement by Lyle F. Watts, Chairman of the interim Water Resources Committee to Governor Patterson. Mr. Watts explained to the governor how Frank McColloch, a water law attorney, "has reviewed the previous drafts of a code prepared by the Oregon Reclamation Congress and had many members of the Reclamation Congress working with him" to research and write the 1955 Groundwater Act. We note that the expansion of the 1927 law to apply across the entire state is an important fact that was fraught with fiction. We argue that such miscalculations and incorrect predictions from the past informed Mr. McCord's zeal 70 years later to target small-time exempt water users.

1953 is the most recent year Oregon legislators would have made revisions to ORS Chapter 537 *Appropriation of Waters Generally* before the major revision in 1955. In 1953, legislators passed HB 440, which empaneled an interim Water Resources Committee to study and draft the legislative concepts for two chapters: ORS 536 on a statewide policy framework, and ORS 537 to regulate groundwater to align with how the state regulated surface water.

In 1955, the legislature introduced two companion bills that the interim Water Resources Committee drafted: HB 25 on the policy side for ORS 536 and HB 26 on the regulatory side for ORS 537. The Speaker of the House in Salem referred the two bills to the House Commerce & Utilities Committee. Then the bills went to the Senate Natural Resources Committee and were eventually signed by Governor Patterson. Facts presented in the lengthy testimony by elected officials and stakeholders (most notably by Frank McColloch, a leading member of the interim committee) point to strong enmeshment between HB 25 and HB 26. The most important implication of this enmeshment is that the ideology and presumptions

associated with one of the bills necessarily implied and implicated the views and outcomes of the other.

One important and relevant example of this enmeshment is the view Frank McColloch shared during a public hearing on February 14, 1955, on HB 25 about the legislative intent for "a state wide coordinated system of water resources development...to make specific proposals and bills for legislative action based upon the committee's findings as to the most immediate needs in water resource development." Mr. McColloch launched into an anxious description of the threat posed by "100,000 wells for domestic and livestock use, and 5,000 new ones being installed annually..." Mr. McColloch further explained, in part:

> ...we found that the population in 1910 when the present water code was adopted was 673,000 people and in 1950, 1,500,000, with the census bureau predicting that we'd have another million people in Oregon at the very least within the next 20 years. Now there are going to be a lot more people but there isn't going to be any more water, and what we have is going to have to be divided among a whole lot more people.
>
> . . .
>
> There isn't going to be any more water for the additional people to meet those additional requirements. We found that the demands have increased. Since 1945, there have been more permits on some of the streams in Oregon than during the entire 36 years previously.

To understand the change in the law that prohibited "watering lawns and gardens for profit" in 1955, we must consider the context that surrounds it, which includes certain critical errors. McColloch worried that Oregon's water sources would be irreparably damaged by the end of the 20th century if water policies and regulations weren't instituted immediately. He continued, saying:

> Now I could go on – in acreage and irrigation; I have made some notes – we have trebled our irrigated acreage in 50 years. In 1900 there were 500,000 acres irrigated in Oregon; in 1950 there were 1,400,000, and that figure was up 33% in the last ten years of that date. In other words, it increased from the 1940 acreage of 1,050,000 to 1,400,000 in the last ten years. Now there isn't going to be any more water, but there are going to be a great many more acres needing water. There are very few streams left. I think the state engineer will tell you, you can count them on the fingers of your hand.

Mr. McColloch sways back and forth between municipal-domestic use and irrigation use; between surface water and groundwater, as if they were all the same threat and equivalent to each other. Today we know he was wrong. Large-scale irrigation uses 78% of all water diverted in the state from aquifers and surface water; meanwhile, domestic wells and municipal uses are a tiny fraction, about one-eighth as much. Mr. McColloch (and his colleagues) did not understand that the residential population and irrigation are not correlated and that they decoupled from each other the moment agricultural exports exceeded in-state sales.

Oregon's population grew by 123% in the first half of the 20th century; whereas, irrigated acres increased by 180%, outpacing population growth by 50%. In a study created for the Water Resource Committee in 1954, OSU experts predicted that irrigated lands could more than double from 1.37 million acres to 2.84 million acres in the future. Today, however, the total is 1.67 million acres, a mere 21% increase in 70 years. Irrigation expansion plateaued: OSU was off by 70%. Meanwhile, Oregon's population did not plateau; rather, it grew steadily from 1.5 million in 1950 to 4.2 million in 2020, a 180% increase in 70 years. Oregon's population outpaced irrigation expansion by a factor of nine, which is almost an order of magnitude.

Eighty percent of all agricultural products are exported, which is why an increase in population does not increase domestic or municipal water use by a volume that could ever compare to the amount of water used by large-scale irrigators. According to the Oregon Department of Agriculture, Oregon exports 40% of agriculture products to other states and 40% to foreign nations: a total of 80% of all agricultural products leave the state. Oregon's population and irrigation water use (volume) have not been correlated since long before the time Mr. McColloch and his colleagues fretted over domestic and municipal populations and their water use.

Mr. McColloch based the 1955 Groundwater Act, not only on the 1927 law imposing restrictions on eastern Oregon, but on his concerns that population and irrigation were going to correlate as they expanded in the future. Many were also of this opinion. This flaw is an important factor to note.

On October 19, 1954, in his submission of comments, Mr. McColloch erred when he correlated population growth with an increase in licenses. He said:

> I call your attention to the last sentence of the third paragraph on page II of the Summary reading as follows: "It is expected that this ratio will increase as population increases." I question whether the ratio will increase. Do you not really mean to say that the number of adults will increase upon the same ratio, namely, one adult in every

four applying for licenses?

Mr. McColloch quibbles on the grammar while misunderstanding the bigger picture that there is no correlation between population and large-scale irrigation water right licenses. If, however, we were to assume that he meant to speak only of exempt domestic wells or municipal public water supplies and not of large-scale irrigation, then the error is two-fold: 1) domestic wells are of little concern because they use less 1/25th the total volume of water than large-scale irrigation wells use in the state, and 2) most of the population lives in suburbs and cities, with the significant majority of residents using water from municipal water supplies, which are much more efficient than single homes.

Mr. McColloch and others feared that state population growth would desiccate Oregon; reality has since proven them wrong. Instead, large-scale irrigation has desiccated Oregon, the effects of which have only been made worse by the insatiable consumption of fossil fuels worldwide that caused the climate to change, heating up the summers and drying out the winters. The insatiable consumption of water in the regions where large-scale irrigation occurs is driven by the same ideology that caused climate change; however, **that unsustainable water use is within the means of Oregonians to control; whereas, climate change is not.** Irrigators still pump like it's 1949; instead, they should reduce pumping commensurate with water availability to stop draining the aquifers.

To blame the aridification of Oregon on domestic well users and municipal public water systems, which use only one-eighth the volume of water that large-scale irrigation does, is dreadfully wrong and misleading. It leads to logic such as that which drives Mike McCord's zeal. Elsewhere, OWRD and others perpetuate this myth. In this linked article, OWRD blames domestic and municipal well users for groundwater declines while claiming that climate change is draining aquifers (as if the *Vapor Pressure Deficit* pumps groundwater in the summers or that reduced groundwater recharge in the winter is responsible for all damage caused by irrigation pumping). Such propaganda is egregious because it shields large-scale irrigators who are harming the aquifers and blames domestic and municipal water users for the damage.

Whether there are two million, four million, or six million residents, the volume of water used by large-scale irrigation does not increase commensurate with population growth. We know that population growth does not correlate with more agricultural exports and large-scale irrigation water use; we know that less than 1% of the population owns or runs large-scale irrigation operations, and because irrigation uses 78% of all water diverted from streams and aquifers, we know that increases in water use associated with population growth are negligible.

The impact of misunderstanding the relationship between population and irrigation water use, on display in the HB 25 hearing, was implicit in Frank McColloch's ideology that shaped HB 26, which set out regulations for groundwater use. While we agree on many of the precepts that drove the legislative process for both bills, there have been numerous unintended consequences of getting the facts wrong since 1955. Mike McCord's recent crackdown on 1/2 acre farmers' market gardeners is one such consequence. Another is OWRD's claims that domestic and municipal users are to blame in the Deschutes Basin (hyperlinked two paragraphs above).

As we write, Oregon officials are pulling out all the stops to blame water scarcity on domestic wells and municipal public water supplies while shielding large-scale irrigators from such scrutiny amidst the current Groundwater Allocation rule-making process to restrict applications for new groundwater rights. If OWRD were to target every gardener in the state who uses their exempt domestic well to irrigate a 1/2 acre farmers' market garden, at the time when the new rule restrictions on Groundwater Allocation take effect, Oregon's farmers' markets and CSAs would be gutted.

While HB 25 had a lengthy public hearing before legislators reviewed proposed amendments and engrossed the bill, HB 26 did not. Legislators engrossed HB 26 in a March 7, 1955 committee meeting before they held an initial public hearing on March 21. Then both bills were sent out of committee with do-pass recommendations on March 28. Officials fast-tracked HB 26, which became the 1955 Groundwater Act.

Only two amendments were proposed for HB 26 regarding Section 5 *Exempt Uses*. The first sought to constrict exempt uses; the other sought to loosen them. Both amendments failed. They inform the context that permitted exempt water use on 1/2 acre lawns and gardens (a question of volume) while terminating the exempt use of water for profit on 1/2 acre gardens, and newly permitting 5,000 gallons per day for any single industrial or commercial water use (questions of commerce).

An excerpt from a request to amend Section 5 *Exempt Uses* in HB 26, sought by M. T. Hoy, State Fisheries Director, on March 2, 1955, exemplifies the mistaken water use concerns expressed by Frank McColloch [**emphasis added**]:

> B. Section 5 provides that "no registration, certificate of registration, application for a permit, permit . . . is required for the use of ground water for stock watering purposes, for watering any lawn or noncommercial garden not exceeding one-half acre in area, for single or group domestic purposes in an amount not exceeding 15,000 gallons a day or for any single industrial or commercial purpose in an amount not exceeding 5,000 gallons a day." **We recommend that licenses be required for these**

> **smaller diversions as well as large ones in order to prevent overappropriation, to protect other water uses, and to prevent pollution.** The requirement of a permit would give all interested agencies an opportunity to keep posted on water usage through notification from the State Engineer's office.

Mr. Hoy called for licensing of the exempt uses under ORS 537.545 because he was concerned that domestic exempt wells would have a negative impact that had to be more carefully managed. Mr. Hoy's request is for all aspects of the exempt wells, which means that water use volume – gallons per day – was his concern. **He wanted to remove all exemptions.** This misplaced concern tracks very closely with the conclusions Mr. McColloch and others expressed about the number of domestic and municipal wells that were being drilled each year and the false equivalency with the threat that large-scale irrigation posed. Today, 225,000 domestic exempt wells use 4% of all groundwater diversions; whereas only 7,000 irrigation wells use 82% of all groundwater diversions.

The legislature passed HB 26 in 1955 without regard for Mr. Hoy's request to amend Section 5 and remove all exemptions. The disregard of his amendment suggests that the elected officials were not concerned with the volume of domestic exempt water use the way Mr. Hoy was. Despite the breathless findings by the interim Water Resources Committee about over-appropriated streams and the risks to aquifers, the legislature decided to keep the pre-1955 exempt uses on domestic wells mostly intact, except for the inconsistent commerce-related provisions.

State Engineer, Lewis Stanley, rebuffed the second amendment proposed for Section 5 of HB 26. On April 11, 1955, the Oregon Drillers Association sought to expand the exempt use of irrigated lawns from a 1/2 acre to whatever extent 15,000 GPD could be put to beneficial use. Stanley "said he believed the limit to 1/2 acre was a good one as the domestic use has been determined by courts to include the watering of livestock and a lawn not exceeding 1/2 acre in size." **Mr. Stanley did not mention the commerce aspects** related to the 1/2 acre garden as permitted in ORS 537.530 prior to 1955; nor did he refer to the newly added exempt use of 5,000 GPD that officials permitted for any single industrial or commercial water use. He responded only to water volume; commerce was not his concern.

Legislators recorded the first slate of amendments to HB 26 on March 8, 1955. Notably, the language on exempt uses in Section 5 never changed from the time legislators introduced HB 26 to the time HB 26 was enrolled and signed by the governor. Amendments to HB 26, recorded on March 29 and April 22, did not touch Section 5 of HB 26. We know from the historical record that the political appointees on the interim Water Resources Committee, which included powerful lawyers and lobbyists as their guests throughout 1953-1955, reviewed the five drafts of the 1955 Groundwater Act that Frank McColloch wrote. In one

case, minutes from February 9, 1954, the Water Resources Committee meeting noted that "the second draft of the first part of the proposed ground water code had been forwarded to a special committee for comments and criticisms." We know Mr. McColloch's work was thoroughly reviewed by a select audience – extensively so. **However, not once in the entire historical record of more than 1,300 pages, is there one reference as to why there was silent consent to strip "watering lawns and gardens for profit" from the existing code.**

Here is the language from ORS 537 in 1953 [**emphasis added**]:

> 537.530 Application or permit for domestic use not required; limitation as to area.
>
> Nothing in ORS 537.510 to 537.600 shall be construed as requiring an application or permit for the developing for beneficial uses of underground waters for domestic and culinary purposes, for stock, or **for the watering of lawns and gardens for profit**, and not exceeding one-half acre in area.

Here is the language from ORS 537 in 1955 following the passage of HB 26 [**emphasis added**]:

> 537.545 Exempt uses.
>
> No registration, certificate of registration, application for a permit, permit, certificate of completion or ground water right certificate under ORS 537.505 to 537.795 is required for the use of ground water for stockwatering purposes, **for watering any lawn or noncommercial garden not exceeding one-half acre in area,** for single or group domestic purposes in an amount not exceeding 15,000 gallons a day or for any single industrial or commercial purpose in an amount not exceeding 5,000 gallons a day.

HB 26 repealed ORS 537.530 and created ORS 537.545. The changes made to exempt uses, when the interim Water Resources Committee met, were: 1) the prohibition of profit from a 1/2 garden, 2) adding new permissions for any single industrial or commercial use of 5,000 GPD, and 3) setting the amount of *Domestic Purpose* water use to 15,000 GPD – a huge amount of water equal to 16 acre-feet per year, which can serve about 75 apartments (or as the Oregon Drillers Association requested in their amendment, use it to irrigate what would work out to about three acres of lawn or garden with that 15,000 GPD allotment).

Prohibiting irrigation of a 1/2 acre garden for profit never had anything to do with concern over the volume of water; rather, the change in statutory language related only to commerce. HB 26 outlawed many small-time local market gardeners. Coming on the heels of the

Victory Gardens of WWII, when the public had been urged to grow food for themselves and support their communities due to a wartime focus on industrial agriculture, prohibiting market garden sales just ten years later reversed all the reasons why they were promoted by shutting down small-scale community-supported agriculture.

Water League asks the rhetorical question on behalf of a confounded public: Why would legislators in 1955 shut down commerce on a 1/2 acre garden while newly permitting double that amount of water use – 5,000 GPD – for other industrial and commercial uses? Why would the government alienate local farmers' market gardeners with a double standard marked by such extreme prejudice? And why would the lawmakers and the appointed members of the interim Water Resources Committee do so with such casual disregard as to leave no historical record of their decision? In 1,300 hundred pages, why is there no discussion about the changes to Section 5 *Exempt Uses* that added 5,000 GPD for any single industrial or commercial use while outlawing "watering lawns and gardens for profit?" And why, now, is Oregon letting Mike McCord proactively seek out farmers' market gardeners for enforcement, knowing the chances of them getting a water right are slim to none given the new Groundwater Allocation rules?

We know that lawns are ubiquitous in Oregon and that there are many times more residential acres dedicated to lawns than gardens of all types (flower, produce, herb, fruit tree). There has never been any noticeable law enforcement by the state to force the desiccation of lawns that residential homeowners have irrigated beyond the legal 1/2 acre limit.

Why would OWRD prefer to target small local market gardeners with harsh threat letters telling them to cease and desist water use when in 2021, they ignored calls from the community to shut off water to the organized crime syndicates that sacked Southwest Oregon? These outlaws used so much water that they dried up domestic wells, turned creeks into gravel roads, and laid waste to the communities and their watersheds all the while perpetrating horrific human rights violations. OWRD, which claimed it was scared to act, didn't even bother to send threat letters to the scofflaw property owners as they recently did to the local farmers' market gardeners growing produce. Notably, Josephine County sent property seizure warnings to every property owner in the fall of 2021, but not a word came from OWRD.

We believe this double standard evinces craven leadership. OWRD should have instead called for a change in the law as we are doing. The crackdown on local market gardeners is irrational given how little water they use and how oversized lawns and cannabis crime syndicates have been ignored by OWRD. The public is outraged (2.8 million views in three weeks and 27,000 incensed comments) because it is plain for all to see this OWRD

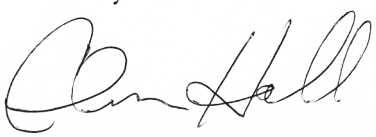
action by mid-level managers perpetuates the very worst stereotypes of petty government overreach. **The public is left to speculate about who benefits from enforcing this part of the 1955 Groundwater Act that water-lawyer-lobbyists crafted 70 years ago but hasn't been noticeably enforced until now.** Water League seeks to end such speculation by requesting legislators to change the law and allow the exempt use of "watering lawns and gardens for profit" from domestic wells.

Lobbying and political pressure come to OWRD in different forms. Recently, on April 3, 2024, the Capital Press ran an article based on a press release from the OWRD about the resolution regarding allegations (some unprovable) of OWRD staff in the Watermasters' offices taking bribes, accepting gifts, and engaging in unprofessional conduct while regulating the cannabis industry water users. This is the same division of OWRD, Field Services, that recently began cracking down on farmers' market gardeners.

The nature of lobbying, the slippery slope to influence peddling, and outright acts of bribery, is that much of the persuasion is done out of sight and is therefore unprovable. The public has made many wild accusations as seen in the comments to the video link two paragraphs above because they are left to guess at the motives of OWRD staff. Similarly, the acts of OWRD Field Services staff have the veneer of plausible deniability given their sanctimonious airs about following the law and the need for the rest of us to rely on their explanations about why they sought to target small-time farmers' market gardeners.

OWRD is not monolithic. As with any agency, organization, or person, OWRD is a complex agency with many actions and ideas that range from admirable to flawed, with most being the result of good, hard work that goes unnoticed daily. There is excellent, if not extraordinary work being done by OWRD staff to shepherd the Groundwater Allocation rules update, the Integrated Water Resources Strategy update, the contentious Division 512 rule-making process to designate the first Critical Groundwater Area in over 30 years, and so much more. Water League strongly supports the good work OWRD does, and we critique the agency when and where reasonable to prevent all that is good from being brought down by a few unfortunate circumstances.

Sincerely,



Christopher Hall
Executive Director
Water League