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foodandwaterwatch.org

June 14th, 2024

Laura Hartt
Oregon Water Resources Department
725 Summer St. NE, Suite A
Salem, OR 97301

RE: Food & Water Watch comments on OWRD's proposed rules

Dear Oregon Water Resources Commission,

Food & Water Watch (FWW) submits the following written testimony in support of the Oregon Water Resources Department's (OWRD's) proposed rules, which are an important step to ensure Oregon's scarce water resources are not over allocated in the future. FWW is a national, non-profit organization that mobilizes regular people to build political power to move bold and uncompromised solutions to the most pressing food, water, and climate problems of our time. FWW uses grassroots organizing, media outreach, public education, research, policy analysis, and litigation to protect people's health, communities, and democracy from the growing destructive power of the most powerful economic interests. FWW submits these public comments on behalf of its more than 38,000 members and supporters across Oregon.

Oregon is long overdue in revising its water permit regulations. We have long seen the harms caused by the overallocation of groundwater resources in the state. Oregon is experiencing chronic well decline and increased drought brought on by climate change. Bringing OWRD's rules into accordance with the 1955 Ground Water Act will help us to protect the more than 36,000 miles of streams, nearly half of all wetlands, and almost two-thirds of all lakes in Oregon that rely on groundwater.

We support OWRD's proposed rules as an important first step in protecting our environment and finite natural resources used by communities across the state, but also recognize that additional steps are needed to ensure that our groundwater resources are allocated in a sustainable and equitable way. OWRD should do everything within its authority to account for the historical racial and socioeconomic barriers to land ownership, especially within agriculture, when allocating new or transferring existing water rights. Additionally, we must prioritize water uses that build resilient communities and promote sustainable, local food systems in the face of climate change.



The proposed rules, coupled with the new groundwater protections established in SB-85, have the potential to make Oregon's groundwater use far more sustainable, protecting both aquifers and rivers and streams. Industrial livestock operations have long benefited from lax water permitting rules and are disproportionately contributing to water level declines. We encourage OWRD to finalize the proposed rules without delay.

Thank you for taking this important step to protect our water resources.

Sincerely,

Aimee Travis

Oregon Organizer, Food & Water Watch