

HARTT Laura A * WRD

From: bbenbaruch@ashlandhome.net
Sent: Wednesday, May 15, 2024 10:12 AM
To: WRD_DL_rule-coordinator
Subject: Proposed rules for groundwater

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I am submitting comments regarding the proposed rules that would do the following:

- Stop the state from issuing new groundwater permits when groundwater levels are not "reasonably stable," and define what that means.
- Require data to demonstrate that groundwater is reasonably stable before a new permit is approved, and stop new permits if there isn't enough data.
- Require an analysis of the impacts of any proposed water withdrawals on rivers and streams fed by groundwater.
- Protect senior surface water rights, fixing issues in the current rules, where junior water rights have too often been given an unjust advantage over senior rights.

These common sense rules are the bare minimum of what is required to safeguard our water. We have no future without protecting our ground water. Literally – we have no future if we don't protect our ground water!

- Stop the state from issuing new groundwater permits when groundwater levels are not "reasonably stable," and define what that means.
 - The definition of “reasonable” must be very restrictive and allow for no “wiggle room” for getting around the imperative of protecting our groundwater.
 - Moreover, for those areas where the groundwater level has decreased, all efforts should be made to restore the groundwater levels – even if it means denying new permits.

Regarding the issue of “water rights” in general, we must move toward eliminating any and all private water rights. Water should be considered a common good and a common resource that must be vigorously protected and managed responsibly and sustainably for the common good. The importance of water for our lives and for the environment compels us to protect our water sources by making them a public good and protecting them from exploitation for private gain at the expense of the public needs.

The proposed rules are good. But they do not go far enough in protecting our water resources.

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