

HARTT Laura A * WRD

From: Bruce Anderson <bruce.eugene@comcast.net>
Sent: Friday, March 29, 2024 3:50 PM
To: WRD_DL_rule-coordinator
Subject: Aligning Oregon's Groundwater Rules with Oregon's 1955 Groundwater Act

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Thank you for the opportunity to comment. I am very encouraged to see that Oregon is finally preparing to amend its groundwater administrative rules to align them with the historic, forwarding looking provisions of the 1955 Groundwater Act. With freshwater access certain to be THE environmental issue for the American west this century, that certainty is only heightened by the climate crisis the whole world is facing. It is therefore all the more important to define “reasonably stable” groundwater levels and prevent new groundwater permits from being issued when groundwater levels are not reasonably stable. I strongly support the proposed rule revisions because they will result in more sustainable management of groundwater in the face of climate change, especially by:

1. Requiring data to determine “reasonably stable” groundwater levels and prevent new groundwater permits from being issued when groundwater levels are not reasonably stable.
2. Better protect streamflows and cold water inputs to rivers and streams from over-pumping hydraulically connected groundwater.
3. Protect senior surface water rights – including instream water rights – by requiring a full accounting of the impacts of proposed pumping on hydraulically connected rivers and streams. This is a critically important improvement because the state’s practice has resulted in issuance of groundwater permits that injure senior surface water rights.

Improving how Oregon issues new groundwater permits is overdue and I look forward to adoption of the proposed rules.

Sincerely,
Bruce H. Anderson
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