



Oregon

Tina Kotek, Governor

Department of Fish and Wildlife

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Laura Hartt
Oregon Water Resources Department
725 Summer Street NE, Suite A
Salem, OR 97301
Via email: WRD_DL_rule-coordinator@water.oregon.gov



RE: Proposed Groundwater Allocation Rules

Dear Laura,

The Oregon Department of Fish and Wildlife (ODFW) appreciates the opportunity to provide support for the Oregon Water Resources Department's (OWRD) efforts to modernize the approach to groundwater allocation in Oregon. Groundwater is an important resource that supports ODFW's mission to protect and enhance Oregon's fish and wildlife and their habitats for use and enjoyment by present and future generations. Stronger protections for our state's groundwater (and indirectly surface water) are increasingly relevant as we learn more about the ongoing declines in aquifer levels and face a future under a changing climate that will only exacerbate Oregon's already degraded water quality and quantity conditions.

Current groundwater allocation practices and policies do not fully protect surface and groundwater resources, allowing for groundwater level declines, reductions in summer baseflows and cold-water discharge to streams, and unmitigated year-round impacts to surface flow (including impacts to instream water rights). These practices have degraded fish and wildlife habitat, leading to declines in populations that are difficult and expensive to correct.

The proposed rules will positively impact fish and wildlife by providing year-round protections to existing water rights, including instream water rights, and by halting further degradation of groundwater-dependent ecosystems. The proposed inclusion of groundwater stability assessments and longer-term impact evaluations in application reviews are necessary to reduce future fish and wildlife impacts. The proposed rules will prevent the future injury of existing instream and out-of-stream surface water rights that has occurred under the current groundwater allocation rules.

*To protect and enhance Oregon's fish and wildlife and their habitats
for use and enjoyment by present and future generations.*

ODFW fully supports the proposed rules and commends OWRD for offering proposed rules that provide greater protections for groundwater-dependent ecosystems. ODFW appreciates OWRD's allowance of other state agencies to provide advice and technical assistance in development of the proposed rules.

Sincerely,

A handwritten signature in black ink that reads "Danette L. Faucera". The signature is written in a cursive style with a large initial "D".

Danette Faucera
Water Policy Coordinator