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To Whom it May Concern:

As an Oregon resident for over 30 years and a professional hydrologist for longer than that, I am pleased to express my support for the Draft Oregon Groundwater Allocation Rules. I urge you to finalize these rules as soon as possible to ensure sustainable management of this critical resource.

Oregon has always been a leader in groundwater management, with the passage of the 1955 Groundwater Act, and the recognition that surface and groundwater are hydraulically connected. These revised rules will continue and elevate Oregon's role as a forward-thinking leader in western water management.

As one of the authors of the original Oregon atlas of Groundwater Dependent Ecosystems^{1,2}, I have been, and continue to be, concerned with the impacts of groundwater withdrawal and declining water tables on Oregon's freshwater ecosystems. A relatively recent update to this Atlas³ demonstrates that more than 36,000 miles of streams, nearly half of all wetlands, and almost two-thirds of all lakes in Oregon rely on groundwater for all, or part of their water supply. These groundwater-dependent ecosystems (GDEs) are some of Oregon's most biodiverse and climate-resilient habitats, and they are threatened by the over-allocation of groundwater.

In addition to the potential impacts to GDEs, unsustainable groundwater management impacts all aspects of human uses. As water levels decline, domestic wells can go dry, often resulting in significant costs to landowners as they dig deeper wells or pay for alternative water supplies, where available. These impacts disproportionately affect rural communities. We have also seen how unsustainable groundwater pumping can cause injury to existing agricultural water users when they are no longer able to access their full senior water rights. These impacts will continue and potentially increase in the future if we do not address our current groundwater management issues.

The Oregon Water Resources Department has undertaken a comprehensive and inclusive process in developing these draft rules. The rules are science-based, and their adoption will promote sustainable groundwater management now and into the future. I believe they will result in benefits to all human sectors that rely on groundwater, including agriculture, municipal water suppliers and domestic well users. They will also go a long way to protecting Oregon's groundwater-dependent streams, wetlands and lakes, and the plants and animals that rely on them.

I applaud the Oregon Water Resources Department and the Oregon Water Resources Commission for their thoughtful, forward-looking approach to developing these draft rules. I urge you to keep this process on track and finalize these rules in a timely manner.

Sincerely,

Leslie B. Bach, Ph.D.

¹Brown JB, Wyers A, Bach LB, and Aldous AR. 2009. Groundwater-dependent biodiversity and associated threats: a statewide screening methodology and spatial assessment of Oregon. The Nature Conservancy. 175 p.

²Brown JB, Bach LB, Aldous AR, Wyers A, DeGagne J. 2011. Groundwater-dependent ecosystems in Oregon: an assessment of their distribution and associated threats. *Frontiers in Ecology and the Environment* 9(2):97-102. Doi: 10.1890/090108

³Freed, Z., Schindel, M., Ruffing, C., & Scott, S. 2022. Oregon Atlas of Groundwater-Dependent Ecosystems. The Nature Conservancy, Portland, OR