



Oregon Council Trout Unlimited
POB 740
Gladstone, OR 97027

May 24, 2024

Laura Hartt
Rulemaking Coordinator
Oregon Water Resources Department

Re: The Oregon Council of Trout Unlimited supports the proposed Groundwater Allocation Rules Revisions.

The Oregon Council of Trout Unlimited (OCTU) is the statewide, grassroots affiliate of the national Trout Unlimited organization. We have 3,400 members in Oregon. Our mission is to care for and recover rivers and streams so our children can experience the joy of wild and native trout and salmon and the clean cold streams we revere in Oregon.

Of the proposed revised rules, the key revision is the requirement that a groundwater source have a documented sustainable reserve before a new extraction permit will be issued.

The current process is unsustainable for fish and wildlife and for future human use both through negative effects on surface water quality and flows and the costs associated with rapidly falling groundwater levels. Climate change makes it imperative that we reverse this trend.

As stated in the OWRD email of March 1, 2024: *“Current groundwater right permitting rules allow for aquifers to decline beyond what nature can replace and do not consider long-term or cumulative impacts on surface water. Addressing the long-term impacts of groundwater use requires updating the rules for reviewing new water right applications.”*

The Oregon Council of Trout Unlimited strongly supports the proposed groundwater allocation rules revisions.

Sincerely,

A handwritten signature in blue ink that reads "Mark W. Rogers". The signature is fluid and cursive.

Mark W. Rogers
Chair Oregon Council