



*The League of Women Voters of Oregon, established in 1920, is a grassroots nonpartisan political organization that encourages informed and active participation in government. We envision informed Oregonians participating in a fully accessible, responsive, and transparent government to achieve the common good. LWVOR Legislative Action is based on advocacy positions formed through studies and member consensus. The League never supports or opposes any candidate or political party.*

May 21, 2024

To: [Laura Hartt, Oregon Water Resources Dept.](#)

Re: **Amending Chapter 690, Divisions 8, 9, 300, and 410 of Groundwater Rules – Support**  
(Amend, repeal, and adopt rules pertaining to allocation of new groundwater rights)

The League of Women Voters of Oregon (LWVOR) adopted positions on water in 1969, 1977, 1985 and updated and consolidated our positions in 2011 after two Water Studies ([Part 1](#) and [Part 2](#)). Using those positions, **LWVOR supports the draft rules proposed by the Oregon Water Resources Dept. and encourages adoption of those rules by the Oregon Water Resources Commission with an urgency the issue demands.**

*The League of Women Voters of Oregon believes that water is a resource that should be managed for the benefit of the public and as a sustainable habitat for all life forms. The League supports Oregon state policies and statutes that promote comprehensive long-range planning for conservation and management of ground and surface water and the improvement of water quality.*

*The League believes that all planning for ground and surface water should include consideration for both the quality of the water and the availability of water to meet the beneficial uses.*

*The League recognizes that effective planning for water protection and use is most effective with a complete inventory of the water resource including all domestic wells and encourages moving toward this goal. Priority efforts should be directed to geographic areas with identified problems and vulnerabilities.*

*The League supports the need to build resiliency and innovation into water planning in order to address climate change impacts.*

The proposed rules reflect the significant growth in Oregon's population as evidenced by the HUGE increase in domestic wells alone over the last 60+ years. Although these draft rules don't address exempt wells, the League has long argued that exempt wells need to be part of the conversation and should be part of future regulation. The proposed rules do reflect the appropriation of almost all surface waters and the over appropriation of groundwater in many areas of Oregon and the link between surface and groundwater. The rules identify the need for accurate data in order to process groundwater permit applications. The agency must have that data so as not to only rely on applicant information. Without that accurate scientific data, even more areas of Oregon will suffer from over appropriation, with dry wells for domestic, agricultural and other industrial uses.

The League has [supported](#) a fund for addressing water well deficiencies and we note that 185 wells have received funding, but the state needs to stop future crises since there have been reports of over 1,200 dry wells. Current data indicates the potential of more dry wells is significant. Besides current wells affecting groundwater availability, these wells can also affect surface water. The number of low-flow streams, especially in the last few years of drought, has significantly increased.

Climate change may well reduce groundwater replacement, certainly at the rate it is pumped using today's permit authorizations. The proposed rules recognize that groundwater levels need to be stable before permits are approved. Data is needed to be able to assess the permit request. **Unless the agency is provided with the funding and research--data-driven evidence that groundwater levels are stable--groundwater permits should not be approved in areas where this criterion is not met.**

The League will continue to support agency funding to assure accurate data when processing water permits. But Oregon cannot ignore the seriousness/lack of water availability. **We encourage the Water Resources Commission to adopt these proposed rules while also moving forward on increased basin studies and other means of collecting accurate data so the agency can fairly adjudicate Oregon's water quantity laws and rules.**

Thank you for the opportunity to discuss these proposed groundwater rules.



Rebecca Gladstone  
President LWVOR



Peggy Lynch  
Natural Resources Coordinator

cc: [Geoff Huntington, Governor's Senior Natural Resources Policy Advisor](#)