



May 21, 2024

Laura Hartt  
Oregon Water Resources Department  
725 Summer St. NE, Suite A  
Salem, OR 97301  
*Submitted via email: wrd\_dl\_rule-coordinator@water.oregon.gov*

**RE: Proposed Groundwater Rules**

Dear Ms. Hartt:

The Conservation Angler (“TCA”) writes to express its support for the proposed groundwater rules. Although they are not perfect, they are a significant improvement to Oregon’s existing groundwater regulations. TCA urges the Oregon Water Resources Commission to adopt them.

TCA is a nonprofit organization that uses science and law to protect wild salmon and steelhead in the Pacific Northwest. For example, TCA has worked with the Oregon Fish and Wildlife Commission to develop angling restrictions in cold water refugia in the Columbia River Basin.

Adopting the proposed groundwater rules is necessary to help protect cold water inputs to rivers and streams from overextraction of hydrologically connected groundwater. As climate change increases stream temperatures throughout Oregon, these cold-water sources are a lifeline to many of the state’s salmon and steelhead species. To help ensure these species continue to exist, the Oregon Water Resources Department must stop the unsustainable use of the public’s groundwater resources. The proposed rules are an appropriate step in that direction.

Oregon’s rivers and streams and cold-water species face unprecedented threats from the overallocation of water rights and climate change. Although much more work is needed to protect the state’s freshwater resources and wild fish from these threats, the proposed rules are an important step forward in responsibly managing groundwater and protecting cold-water sources.

Thank you.

*Rob Kirschner*

Rob Kirschner  
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