

HARTT Laura A * WRD

From: Steve Lanigan <lanoman@mac.com>
Sent: Friday, June 14, 2024 11:14 AM
To: WRD_DL_rule-coordinator
Subject: Groundwater rules comments

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I'm very concerned that the state is issuing new groundwater permits without knowing the ramifications of doing so. Livability for people and natural recourses depend on having adequate water. Please consider my comments as part of your proposed rule updates.

New allocation rules should address the following to prevent further groundwater level declines across the state.

- Prevent new groundwater permits from being issued when groundwater levels are not reasonably stable. It makes no sense to allocate permits without knowing the ramifications of doing so. That also means that "reasonably stable" has to be defined.
- Determine the amount and type of data needed to determine whether ground water levels are reasonably stable so this does not become a subjective determination.
- Require denial of a permit application if data is not available for determining stable groundwater levels
- Protect senior surface water rights (including in stream water rights by requiring a full accounting of the impacts of proposed pumping on hydraulically connected rivers and streams.

Thank you,

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