

HARTT Laura A * WRD

From: Sue <speyfishergirl@gmail.com>
Sent: Sunday, June 2, 2024 3:34 PM
To: WRD_DL_rule-coordinator
Subject: Groundwater Allocation Rulemaking

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Dear Oregon Water Resources Department,

Thank you for this opportunity to comment on the proposed updates to your groundwater allocation rules. Updates to the groundwater permitting rules seem overdue.

It's vitally important that Oregon's groundwater allocation rules be updated to ensure that there is actually groundwater available and a reasonably stable supply before any new groundwater right is issued, that any new right will not impact existing groundwater and surface water rights (many groundwater sources are hydrologically connected to surface waters) and that there is a reasonable basis for concluding that there will be sufficient water to satisfy existing groundwater and surface water rights into the future.

Additionally, the rules should be updated to establish the amount and type of data needed to determine whether groundwater levels are reasonably stable — and require denial of a permit application until such data is available.

Finally, the rules need to protect all senior water rights including instream surface water rights by fully analyzing and accounting for the impacts of proposed groundwater pumping on hydraulically connected rivers and streams (i.e., the physical connection and interaction of streams and waterways throughout a river network). This will prevent further injury to senior surface water rights from issuance of new groundwater permits.

Through the proposed updates, the new rules will:

- result in more sustainable management of groundwater
- ensure better protection of streamflows and cold water inputs to rivers and streams from impacts of over-pumping hydrologically connected groundwater
- better prepare the state to manage and protect groundwater and surface water supplies from the challenges of climate change.

Sincerely,
Sue Safford
Portland, Oregon