

HARTT Laura A * WRD

From: mfwherley@everyactioncustom.com on behalf of Michael Wherley
<mfwherley@everyactioncustom.com>
Sent: Monday, May 6, 2024 11:08 AM
To: WRD_DL_rule-coordinator
Subject: Approve sustainable groundwater rules that protect Oregon wildlife

[Some people who received this message don't often get email from mfwherley@everyactioncustom.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Dear Water Policy Analyst Laura Hartt,

I support the Oregon Water Resources Department's proposed rule changes that provide an important, positive step toward preventing further degradation of Oregon's overallocated groundwater systems.

However, the proposed rules don't go far enough to address the current issues of Oregon's overallocated groundwater systems. In many areas around the state, groundwater levels are falling at unsustainable rates. While the proposed rules prevent that rate of decline from worsening, they do nothing to slow or stop the current rate of decline, nor do they address issues with permits currently in existence or permit applications in process prior to the rules' adoption.

Oregon's groundwater rules must go further to protect groundwater-dependent ecosystems and wildlife. In addition to considering whether groundwater sources are hydrologically connected to streams and rivers, the department must adopt rules that consider groundwater's connectivity to other water features like springs, wetlands and fens that could also be affected by pumping. These ecosystems provide important habitat for an amazing array of wildlife and plants that are increasingly at risk due to their interdependent connection to groundwater — levels of which have been declining statewide for decades due to outdated permitting rules.

Improving how Oregon issues new groundwater permits is long overdue, and these proposed rule changes are important and should be implemented promptly to prevent further worsening of a damaged system. Adopting the proposed rules should be considered as only the start of what Oregon should do to improve sustainable groundwater management for its residents and wildlife who depend on these important water sources.

Sincerely,
Michael Wherley
OR 97402-4931