

## HARTT Laura A \* WRD

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**From:** Kristy Overton <asdf@perfectlyvalidemail.com>  
**Sent:** Tuesday, June 11, 2024 7:10 PM  
**To:** WRD\_DL\_rule-coordinator  
**Subject:** Groundwater Rulemaking Revisions

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Oregon Water Resource Department Commissioners State of Oregon,

Hello,

I'm writing to express my support for the strongest possible protections for our groundwater resources. The groundwater rulemaking process must do more to address our growing water allocation crisis.

Ok, obviously, I'm using a pre-filled form here, with the encouragement to talk about why I personally care. This is a somewhat baffling instruction. I'm a human being. I live in Oregon. I won't last long without water! And as the climate becomes less stable, we've got to think proactively and systemically about how we can maintain the water resources we have.

That said, I call upon you to:

Implement strong groundwater rules!

- Hold the agriculture industry to account as, apparently, that's where over 3/4 of our water usage goes. That water belongs to ALL Oregonians; if they're wasting it, we all suffer.
- Protect Oregon's rapidly depleting aquifers AND interconnected surface waters from permanent damage.
- Plan for climate change-driven drought and less reliable water supplies.

Acknowledge hydrologic connections in the water cycle – between groundwater and streams – and use the Public Trust Doctrine to stop draining our aquifers. The Public Trust Doctrine requires you to hold water in trust for the future. Use it!

Implement minimum stream flow requirements as required by the Endangered Species Act and the Public Trust Doctrine, which, respectively, protect fish and humans. Oregon used to have minimum stream flows, but in 1987 they were replaced by an Orwellian process that

gives ecosystems junior water rights to their own water! Now, in the summer when minimum stream flows are most needed, senior irrigation water right holders trump those junior in-stream rights and over-pump our streams. Instream flows must be treated as reserved water rights that are not subject to diversion.

Protect water for critical human needs including domestic uses, Tribal fishing practices, small-scale local food production, and municipalities from rampant non-beneficial uses of water by industrial agriculture, which accounts for the majority of Oregon's water use. 80% of all agricultural products in Oregon are exported out of state – that's a lot of our water leaving the state – some of it permanently! The idea that whoever got in line first could use water for personal gain at the expense of the greater public interest is an inequitable and unjust vestige of the Wild West that harms ecosystems and river-dependent communities.

Thank you for the opportunity to comment. I hope you take my concerns seriously and begin doing more to uphold and enforce the laws that are designed to protect our environment, public trust waters, and our descendants.

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