

HARTT Laura A * WRD

From: Marie Knight <noreply@adv.actionnetwork.org>
Sent: Thursday, June 13, 2024 3:13 PM
To: WRD_DL_rule-coordinator
Subject: Groundwater Rulemaking Revisions

Oregon Water Resource Department Commissioners State of Oregon,

I write today to encourage your efforts to protect our public trust waters with reasonable and just water allocation rules to protect our dwindling groundwater resources. The groundwater rulemaking process must do more to address our growing water allocation crisis.

I call upon you to: remember that all life begins and ends with water. It is a human right that be reserved for all life to access and not for few to gain profit or benefit. We can all thrive with sustainable practices and resources that ensure clean water access for everyone.

Implement strong groundwater rules is needed to: a) Curb excessive use/waste, by the agricultural industry, which accounts for 78% of all water that humans use in Oregon; b) Protect Oregon's rapidly depleting aquifers AND interconnected surface waters from permanent damage; and c) 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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